



# CIVIL SERVICE COMMISSION

## COUNTY OF LOS ANGELES

COMMISSIONERS: DENNIS F. HERNANDEZ • NAOMI NIGHTINGALE • STEVEN AFRIAT • JOHN DONNER • Z. GREG KAHWAJIAN  
STEVE CHENG, INTERIM EXECUTIVE DIRECTOR

May 23, 2018

### FINAL COMMISSION ACTION

Subject of Hearing: *Petition of **CAREN MANDOYAN** for a hearing on her **discharge**, effective September 14, 2016, from the position of Deputy Sheriff, Sheriff's Department, Case No. 16-276.*

The Civil Service Commission, at its meeting held on May 16, 2018 approved findings in the above-entitled case. The petitioner's objections were overruled. Commissioner Nightingale was absent.

Since a copy of these findings has already been provided to all the parties, we have enclosed a copy of the signed formal order of the Commission for your records.

Anyone desiring to seek review of this decision by the Superior Court may do so under Section 1085 or 1094.6 of the Code of Civil Procedure as appropriate. An action under Section 1094.6 can only be commenced within 90 days of the decision.

Steve Cheng  
Interim Executive Director

Enclosure

c: Caren Mandoyan  
Michael Goldfeder  
Christine Roam  
Joseph Scully

BEFORE THE CIVIL SERVICE COMMISSION OF THE  
COUNTY OF LOS ANGELES

*In the matter of the **discharge**, effective )  
September 14, 2016, from the position of )  
Deputy Sheriff, Sheriff's Department, of )*

ORDER OF THE CIVIL  
SERVICE COMMISSION

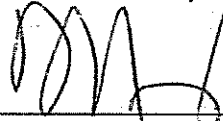
**CAREN MANDOYAN**  
**(Case No. 16-276)**

On May 16, 2018, the Civil Service Commission of the County of Los Angeles over-ruled the Petitioner's objections. The Commission adopted as its final decision, the findings and recommendation of the Hearing Officer, Joseph Scully, to sustain the Department. Commissioner Nightingale was absent.

Dated this 23<sup>rd</sup> day of May, 2018.



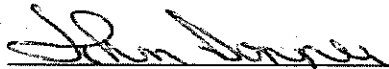
STEVEN AFRIAT, President



DENNIS F. HERNANDEZ, Member

Absent

NAOMI NIGHTINGALE, Member



JOHN DONNER, Member



Z. GREG KAHWAJIAN, Member

1 CHRISTINE ROAM, Sergeant  
2 Sheriff's Advocacy Unit  
3 4900 South Eastern Avenue  
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8 COUNTY OF LOS ANGELES SHERIFF'S DEPARTMENT

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CIVIL SERVICE  
COMMISSION

BEFORE THE CIVIL SERVICE COMMISSION

COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

9 In the matter of the DISCHARGE of  
10 CAREN MANDOYAN,

11 Appellant,

12 vs.

13 COUNTY OF LOS ANGELES SHERIFF'S  
14 DEPARTMENT,

15 Respondent/Department.

Case No.: 16-276

**RESPONDENT COUNTY OF LOS  
ANGELES SHERIFF'S DEPARTMENT'S  
REPLY TO APPELLANT'S  
OBJECTIONS TO THE HEARING  
OFFICER'S FINDINGS OF FACT,  
CONCLUSIONS OF LAW, AND  
RECOMMENDATION**

Hearing Officer: Joseph Scully

Hearing Dates: July 24, 25, 26, and September  
27 & 29, 2017

18 **I.**

19 **INTRODUCTION**

20 The Department discharged Appellant for dishonesty, as well as his extremely poor  
21 judgment and inappropriate treatment of a coworker, Deputy [REDACTED] both during and  
22 after the time they were in a dating relationship (from March 2013 through July 2015).  
23 Appellant's attempts to control Deputy [REDACTED] and force her to remain in a romantic relationship  
24 with him intensified over time, culminating in an act of domestic violence in September of 2014,  
25 and at least two attempts to forcibly enter her apartment between December of 2014 and January  
26 of 2015. Appellant's escalating and persistent behaviors ultimately led a reluctant Deputy  
27 [REDACTED] to report his conduct to the Department, file a criminal domestic violence/stalking report  
28 with the El Segundo Police Department (where Appellant is the named suspect), and have him

1 served with a domestic violence restraining order. When Appellant was served with the  
2 domestic violence restraining order, he was required, pursuant to Department policy, to  
3 immediately notify the Department. He did not.

4 During the administrative investigation, Appellant lied about his attempts to force entry  
5 into Deputy [REDACTED] apartment, which were captured on video. The Department determined  
6 that Appellant's conduct, coupled with his dishonesty, brought embarrassment and discredit to  
7 the Department and rendered him unsuitable for County service.

8 Appellant has argued that Deputy [REDACTED] allegations are false and the result of a  
9 personal vendetta she has against him because he refused to engage in a long-term relationship  
10 with her and instead chose to date her nemesis. However, he has offered absolutely no evidence  
11 to support this theory. Appellant did not assert this when interviewed as part of the  
12 administrative investigation, opted not to testify at hearing, and proffered no other testimony or  
13 evidence in this regard.

14 Throughout the hearing, Appellant's counsel vigorously attacked Deputy [REDACTED]  
15 credibility and argued in his closing brief that her testimony should not be believed. Over the  
16 course of two days of hearing, Deputy [REDACTED] testified, affording the hearing officer an  
17 opportunity to observe her demeanor, evaluate the consistency of her numerous recorded  
18 statements, and reach a determination regarding her credibility. His recommendation to the  
19 Commission includes an analysis and explanation as to why he found Deputy [REDACTED]  
20 testimony credible.

21 In his objections to the Commission's Proposed Decision, Appellant has raised no new  
22 arguments, only a general complaint that the hearing officer "overlooked, discarded, or totally  
23 ignored" the Appellant's arguments. To the contrary, a reading of the hearing officer's report  
24 shows that he carefully considered Appellant's arguments, but was unpersuaded by them.  
25 Instead, he found that the weight of the evidence supported the Department's allegations and  
26 justified the discharge of Appellant. Specifically, the hearing officer concluded that Appellant  
27 committed an act of domestic violence and vandalism against Deputy [REDACTED] engaged in  
28 stalking behaviors as a result of his obsession with her, attempted more than once to break into

1 her residence, and lied when questioned about his conduct as part of the Department's  
2 administrative investigation. The hearing officer rightfully concluded:

3 "In acting as he did, Appellant demonstrated multiple deficiencies which  
4 render him unfit for further service as a deputy. He was not honest or truthful in  
5 his IAB interview which suggests that his reputation for integrity is unwarranted.  
6 His lack of honesty alone calls into question his fitness for future service."

Hearing Officer Report page 19.

7 The Hearing Officer's findings of fact, conclusions of law and recommendation are  
8 wholly supported by and consistent with the evidence presented at hearing. For these reasons,  
9 the Commission must overrule Appellant's objections and adopt the Hearing Officer's  
10 recommendation as its final decision.

## 11 II.

### 12 SUMMARY OF FACTS

#### 13 **A. Background**

14 Appellant was hired as a Reserve Deputy on July 11, 2000 and lateraled as a full-time  
15 deputy in 2006. He was assigned to West Hollywood Sheriff's Station from February 2007 to  
16 February 2013, and served as a training officer since 2009. From February 2013 to the time of  
17 his discharge, he was assigned to South Los Angeles Station. Appellant was a tenured,  
18 respected deputy whose last two performance ratings were "Very Good" and "Competent." He  
19 received a five-day suspension in 2016 for violating the pursuit policy. Appellant was  
20 discharged effective September 14, 2016.

21 Deputy [REDACTED] began her employment with the Sheriff's Department in  
22 September of 2006. She worked custody assignments as a deputy sheriff at Twin Towers  
23 Correctional Facility and Court Transportation Bureau. In 2012 Deputy [REDACTED] began patrol  
24 training at West Hollywood Station. Appellant was Deputy [REDACTED] assigned training officer  
25 during her final phase of patrol training from September 2012 through December 2012.

26 Shortly after he signed her off training, they began a dating relationship.

27 Deputy [REDACTED] resigned from the Department on September 25, 2017, two days prior to  
28 her second Civil Service hearing appearance. Deputy [REDACTED] testified that she resigned as a

1 result of the stress of this Civil Service hearing. She hoped her resignation would free her from  
2 her obligation to testify in this matter. Despite her misgivings, [REDACTED] [REDACTED] honored the  
3 subpoena and concluded her testimony on September 27, 2017.

4 **B. Dating Relationship**

5 Appellant and Deputy [REDACTED] began dating around December 2012. In February 2013,  
6 Appellant transferred to South Los Angeles station. Around the same time, Deputy [REDACTED]  
7 was injured on duty (IOD) and off work for five to six months. When Deputy [REDACTED] returned  
8 to work, Appellant began demanding that she not attend briefing, not talk to her partners, and  
9 not respond with her partners on calls. He convinced her that her partners did not like her and  
10 were all talking behind her back. Initially, Deputy [REDACTED] was flattered by Appellant's  
11 attention, but eventually realized that he was trying to control and isolate her.

12 By the end of 2013, Appellant and Deputy [REDACTED] had been dating for approximately a  
13 year. Deputy [REDACTED] testified that she was feeling "suffocated" "overwhelmed" and  
14 "trapped," and characterized their relationship as "hostile". By this time, she had  
15 unsuccessfully attempted to break up with Appellant on several occasions, but Appellant  
16 would not accept it. Deputy [REDACTED] knew that Appellant claimed to be a "Reaper"<sup>1</sup> and he  
17 would constantly remind her that he knew people in high places on the Department. Because  
18 of the status and influence she believed he had, Deputy [REDACTED] wanted to keep their  
19 relationship amicable. Appellant had threatened to ruin both her career and her father's  
20 career,<sup>2</sup> so it was important to her that when they parted ways, it be on good terms. When she  
21 would try to break up with Appellant, he insisted that they work on their relationship.  
22 Because she was desperate to avoid an unpleasant breakup with a fellow Department member,  
23 Deputy [REDACTED] would acquiesce and things between them would improve for a bit. Deputy  
24 [REDACTED] endured, hoping that Appellant would lose interest in her and move on.

25  
26  
27  
28 <sup>1</sup> "Reapers" are members of a Department clique who have similar, numbered tattoos.

<sup>2</sup> Witness [REDACTED] father is also a deputy on the Department.

1 **C. September 1, 2014 - Domestic Violence Incident**

2 On or around September 1, 2014, Deputy [REDACTED] went out to socialize with a friend.  
3 Appellant joined them for a drink, and as the evening progressed, the situation between  
4 Appellant and Deputy [REDACTED] became tense. They returned to Deputy [REDACTED] apartment and  
5 the friend left. Appellant demanded to see Deputy [REDACTED] phone, and when she refused, he  
6 seized it and they began to struggle over it. Appellant grabbed Deputy [REDACTED] by her neck and  
7 pushed her to the couch and began to strangle her. As he strangled her, he appeared to be in a  
8 blackout rage and told her, "Look what you're making me do. Look what you're making me  
9 do." Deputy [REDACTED] was unable to breathe. She was scared and believed she was going to die  
10 as a result of Appellant's rage over her cell phone.

11 Deputy [REDACTED] kicked at Appellant to push him off of her. He grabbed her jeans and  
12 ripped them from the waist to the leg. Deputy [REDACTED] freed herself and ran to the bedroom.  
13 As she closed the bedroom door to lock herself in, Appellant blocked the door with his foot,  
14 causing damage to the bottom of the door. Deputy [REDACTED] told Appellant to leave, and he  
15 complied, taking her phone with him.

16 After Appellant left, Deputy [REDACTED] noticed Appellant had inflicted marks on her neck  
17 and arms during the struggle. She took pictures of her injuries and the damage Appellant  
18 caused to her bedroom door.

19 Shortly after the incident, Appellant apologized "profusely," begged her not to leave  
20 him, and promised that he would never do it again. She told him that she needed to be left  
21 alone. She felt trapped and even more fearful of him now than she had been before. She  
22 wanted to break up with him, but it was still important that when they broke up, it be an  
23 amicable break, not because somebody did something wrong. She did not want Appellant to  
24 harbor hostility toward her that he might direct toward harming her or her father's careers.

25 Deputy [REDACTED] did not immediately report this incident to law enforcement because  
26 she did not want to open "Pandora's Box." She knew if she reported the assault to law  
27 enforcement, the Department would become involved and Appellant would lose his job. It  
28 was not an option that she was comfortable with.

1 **D. December 27, 2015 - Attempted Forced Entry**

2 Both parties acknowledge that by December 27, 2015, their relationship was over.  
3 Despite this, on December 27, 2015, Appellant repeatedly called Deputy [REDACTED] She refused  
4 to answer. She heard noises outside the windows and door of her apartment, and realized that  
5 Appellant was removing a screen from her window and knocking on her window and door.  
6 She began video recording [DX 29, video files 700, 702 and 703].

7 Video 700 is taken from inside Deputy [REDACTED] apartment and lasts approximately 19  
8 seconds. As Deputy [REDACTED] approaches her sliding glass door, loud noises can be heard. There  
9 is a brief glimpse of Appellant through the blinds as he appears to be making a phone call, then  
10 the video ends. Deputy [REDACTED] testified that whenever she would receive a phone call, her  
11 video recorder on her phone would shut off. She also testified that Appellant called her  
12 incessantly while outside her apartment.

13 The next video in the series is 702, and lasts 27 seconds. The video shows Appellant  
14 crouched at Deputy [REDACTED] sliding glass door using a metal pulley as a pry tool. Fifteen  
15 seconds into the recording, Appellant becomes aware of Deputy [REDACTED] recording him and has  
16 a surprised look on his face when he asks, "Oh, really?" He then tells her, "Go ahead. Go  
17 ahead," as he pulls his cell phone out of his pocket.

18 Video 703 lasts 19 seconds and shows Appellant with a black and white patterned  
19 broomstick in his hand, attempting to pry the door off the rail. Deputy [REDACTED] tells him,  
20 "Stop!" and he asks her, "What are you doing?" She responds, "What do you think I'm  
21 doing?" He asks, "Are you filming me?" to which she responds, "Yeah, I am. Stop trying to  
22 break into my house."

23 Deputy [REDACTED] did not report this incident to the Department or law enforcement  
24 because she did not want Appellant to get in trouble or lose his job; however, she once again  
25 threatened to report him to the Department if he refused to leave her alone.

26 **E. January 26, 2015 – Bathroom Window Entry**

27 In the early morning hours of January 26, 2015, Deputy [REDACTED] was working her patrol  
28 assignment at Universal CityWalk. Appellant showed up at the substation unannounced, and

1 she saw him in the briefing room. She was not scheduled to end her shift until 4:00 AM, but  
2 she quickly changed her clothes and left early without advising anyone. On prior occasions,  
3 Appellant had followed her home from work, pulled in front of her on the freeway and  
4 slammed his brakes. She wanted to avoid a repeat of that. On her way home, Appellant called  
5 her cell and she spoke to him for 26 minutes. During the conversation, she demanded  
6 Appellant leave her alone, and explained she wanted to move on with her life and find  
7 someone who would treat her better. When she arrived at her apartment, she ran up the stairs  
8 and locked the door. Appellant was close behind. He began pounding loudly on the security  
9 door of her apartment. Then he went around to her back patio and began pounding on her  
10 sliding glass door. Deputy [REDACTED] used her cell phone and began recording [DX 29, videos  
11 777, 778, 779, 780, 781 and 783].

12 Video 777 lasts 3 seconds and shows the darkened interior of Deputy [REDACTED]  
13 apartment. Video 778 lasts 7 seconds and is also of the darkened apartment interior. In both  
14 videos, there are sounds outside consistent with someone attempting to open a window. Video  
15 779 lasts 14 seconds. Deputy [REDACTED] announces, "You need to leave." Appellant can be heard  
16 saying, "[REDACTED]" and Deputy [REDACTED] responds, "You need to leave."

17 Video 780 is a continuation of recording from inside the darkened apartment and lasts  
18 one minute and thirteen seconds. Deputy [REDACTED] can be heard demanding Appellant to get  
19 away from her door and go home. Appellant's voice is muffled and the words are indistinct.

20 Video 781 lasts 53 seconds. It is filmed from inside Deputy [REDACTED] darkened  
21 bathroom. At 00:23, ambient lighting from outside the bathroom window can be faintly seen  
22 and at 00:38 the outline of a hand can be seen pushing the window open from outside. The  
23 sound of the window opening is heard as Deputy [REDACTED] demands, "Get the fuck out of my  
24 house." Deputy [REDACTED] repeats, "Get the fuck out of my house, Caren! Get out! Stop, dude!"  
25 Deputy [REDACTED] sounds frightened. She testified that as Appellant is entering through her  
26 bathroom window, he is throwing toiletry items from her windowsill at her. Appellant tells her  
27 to come outside. Deputy [REDACTED] announces, "I'm calling the cops. I'm calling the cops."  
28

1 Video 0783 is complete blackness with audio and lasts 29 seconds. Appellant is asking  
2 Deputy [REDACTED] where she intends to find this person, as Deputy [REDACTED] tells him over and over  
3 to get out of her window.

4 Deputy [REDACTED] testified that despite feeling frightened and annoyed by Appellant's  
5 attempt to enter her bathroom through the window, she did not call law enforcement because  
6 she did not want Appellant to lose his job.

7 After this incident, Deputy [REDACTED] landlady informed her that other tenants had  
8 complained about the commotion. She informed Deputy [REDACTED] that another incident would  
9 result in her being evicted. Deputy [REDACTED] advised Appellant that he had to leave her alone;  
10 their relationship was over. She had nowhere to go, and she would not allow him to jeopardize  
11 her residence. She once again threatened that she would get the Department involved if he did  
12 not stop.

13 **F. New Phone Carrier**

14 After the January 26 incident, in order to prevent Appellant from contacting her,  
15 Deputy [REDACTED] got a completely new phone with a new number with a new carrier.  
16 Throughout their relationship, Appellant knew details of conversations she had with other  
17 people, and she believed that he may have somehow bugged her phone. She was unaware of  
18 how he would have accomplished that, but in order to prevent any software from  
19 automatically downloading, she changed everything about her phone and did not provide  
20 Appellant with her number.

21 **G. Harassing Text Messages Continue – February 2015 through June 21, 2015**

22 Despite changing her phone number, Deputy [REDACTED] began receiving annoying and  
23 harassing text messages in February 2015. Deputy [REDACTED] ignored and deleted most of the  
24 texts because they were addressed to her and about her. On June 3, 2015, Deputy [REDACTED]  
25 learned that Sergeant [REDACTED] [REDACTED] received an anonymous text message alleging that  
26 Deputy [REDACTED] was sleeping with [REDACTED] husband, Deputy [REDACTED] [REDACTED] and that [REDACTED]  
27 had genital herpes. When Deputy [REDACTED] learned of the text, she felt it crossed the line. The  
28

1 harassing text messages were now involving other Department members, and had to be  
2 stopped. Deputy [REDACTED] was extremely upset and believed that Appellant was responsible for  
3 the text. She called Appellant. She was heated when she accused him of sending the text to  
4 Sergeant [REDACTED] and angrily told him he was crazy and this had to stop. She told him to  
5 leave her alone and leave her partners alone. And she threatened if he did not, she would get  
6 the Department involved.

7 Texts to other Department members ceased after June 3, but Deputy [REDACTED] continued  
8 to receive anonymous harassing text messages. From February through June 2015, Deputy  
9 [REDACTED] estimates she received from 40 to 50 anonymous, harassing text messages. The content  
10 of these messages included specific information about her day-to-day life that could only be  
11 known by someone close to her or if she were under surveillance. She decided that these texts  
12 must stop, so on Father's Day – June 21, 2015 – she met with Appellant to explain how serious  
13 she was about putting an end to the texts. After telling him these texts had to end, she told him  
14 to move on with his life; that he was jeopardizing his job. Appellant denied sending Deputy  
15 [REDACTED] the text messages, but Deputy [REDACTED] did not believe his denials, as he was the only  
16 person who was that interested in her life.

17 During this conversation, Appellant intimated that he had been outside her apartment  
18 listening while she had sex with another man. He also asked her about condoms she had  
19 purchased. She realized that Appellant obtained that information by hacking into her Amazon  
20 account.

#### 21 **H. June 23, 2015 - Department Notification**

22 On June 23, 2015 at 8:54 AM, Deputy [REDACTED] once again received an annoying and  
23 harassing text message from an anonymous texting service. She realized that Appellant was  
24 never going to move on. At 9:30 AM, she called Lieutenant Robert Wiard and reported that  
25 since breaking up with Appellant in December of 2014, she felt she was being stalked by  
26 Appellant; that he had attempted to break into her house; and was texting both her and her co-  
27 workers. This report to Lieutenant Wiard initiated the Department's administrative  
28

1 investigation into this matter. Department protocols require immediate action to protect the  
2 workplace. Appellant would have been ordered not to contact Deputy [REDACTED]

3 The harassing texts to Deputy [REDACTED] immediately ceased after this notification.

4 **I. July 10, 2015 – Appellant Relieved of Duty**

5 Based on the serious nature of the allegations, the Department relieved Appellant of  
6 duty on July 10, 2015.

7 **J. July 14, 2015 – Restraining Order and Police Report**

8 On July 14, 2015, Deputy [REDACTED] contacted El Segundo Police Department and made a  
9 formal, criminal complaint against Appellant. The report listed Appellant as a criminal suspect  
10 for felony stalking, a violation of Penal Code section 646.9(a), ESPD report #15-1659.

11 **K. July 22, 2015 – Appellant Served with Restraining Order**

12 On July 22, 2015 Appellant was personally served with the domestic violence  
13 restraining order naming Deputy [REDACTED] as the protected person. Appellant understood that he  
14 was expected to immediately notify a supervisor at his Unit of Assignment in the event he was  
15 served with a restraining order, but he did not.

16 **III.**

17 **POLICY SECTIONS THAT SERVED AS BASIS FOR APPELLANT'S DISCHARGE**

18 The Hearing Officer specifically found that the Department proved by a preponderance  
19 of the evidence that Appellant violated the following policies, which serve as the basis for his  
20 discharge:

21 **A. MPP 3-01/030.05 – General Behavior**

22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

[illegible]

1 [REDACTED]  
2 [REDACTED]  
3 ...  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 D. [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 E. MPP 3-01/050.30 – Off-Duty Incidents  
20 This policy provides in part:  
21 ...  
22 Members who are arrested or detained for any offense, or named as a suspect,  
23 other than an infraction under the Vehicle Code, shall immediately notify their  
24 immediate supervisor or Watch Commander of the facts of the arrest or  
25 detention or allegation...  
26   
27 *After business hours, and/or if the member is unable to contact their immediate*  
28 *supervisor or Watch Commander at their Unit of Assignment, the member shall*  
*contact Sheriff's Headquarters Bureau and request immediate notification to*  
*their Unit Commander. The member shall provide details of the arrest,*  
*detention or allegation to Sheriff's Headquarters Bureau personnel, including*

alleged charge(s), location, police agency jurisdiction, and return phone number where the member can be reached...

Department's Exhibit 2, page 11 (**emphasis added**).

A failure to notify the Department of an off-duty incident carries a discipline range of 3 to 10 days.

**F. MPP 3-01/040.69 – Honesty Policy**

Department members are held to the highest standards of integrity and ethics. In particular, honesty and trustworthiness are of paramount importance to the credibility and integrity of all Department members. Honesty and maintaining the trust of those we serve depend on candor, forthrightness, sincerity, and accuracy.

Dishonesty destroys trust and violates Department policy. Examples of dishonesty and violations of trust include not only false statements, but also deliberate distortions of the truth, intentional exaggerations, concealment of or failure to disclose material facts, observations, or recollections, and the failure to make full, complete and truthful statements when required.

Department members who violate this section are subject to discipline up to and including discharge.

Department's Exhibit 2, page 13 (**emphasis added**).

A violation of the *Honesty Policy* carries a discipline range of 25 days to discharge.

**G. MPP 3-01/040.70 – Dishonesty/False Statement**

Members shall not make false statements or commit any other violations of the honesty policy, section 3-01/040.69, when questioned [or] interviewed, or in reports or documents submitted. Department members who violate this section are subject to discipline up to and including discharge.

Department's Exhibit 2, page 15 (**emphasis added**).

A violation of this policy carries a discipline range of 25 days to discharge.

**H. MPP 3-01/040.75 – Dishonesty/Failure to Make Statements and/or Making False Statements During Departmental Internal Investigations**

False statements and any other form of dishonesty during an official Department internal investigation or inquiry shall, absent extenuating circumstances, result in discharge.

Failure or refusal to make statements when ordered during Departmental investigations constitutes insubordination and shall, absent extenuating circumstances, result in discharge.

Department's Exhibit 2, page 15 (**emphasis added**).

A violation of this policy carries a discipline range of 25 days to discharge.

**IV.**

**ARGUMENT**

**A. The Department's Decision to Discharge Appellant Was Appropriate**

Department's decision maker, Assistant Sheriff [REDACTED], testified he reviewed the administrative investigation. He evaluated the credibility of both Appellant and Deputy [REDACTED]. He carefully considered Ms. [REDACTED] statements in light of any motive she may have to lie, along with photographic, video and other witness testimony. Over his 39-year career in law enforcement, Assistant Sheriff [REDACTED] has had extensive experience handling domestic violence cases and has served on the Domestic Violence Council. Based on a totality of the evidence, he formed the opinion that Deputy [REDACTED] was credible, and found that the video evidence supported her allegations.

Assistant Sheriff [REDACTED] also considered Appellant's statements during his subject interview, and found they undermined his credibility. Despite clear video evidence of Appellant kneeling at the sliding glass door and trying to pry it off the rail while Deputy [REDACTED] ordered him to leave, Appellant claimed he was only using the metal pulley to knock and get Deputy [REDACTED] attention. Assistant Sheriff [REDACTED] had experience as a crime prevention officer who taught classes on the weaknesses and vulnerabilities of sliding glass doors. He immediately recognized that Appellant was in fact attempting to use the metal pulley as a lever to lift the sliding glass door out of its track. Appellant's patently false statements during his interview undermined his overall credibility. He considered Appellant's attempts to break into Deputy [REDACTED] apartment to be an extremely dangerous act considering both of them were peace officers and possessed firearms. In this emotionally-charged situation where Ms. [REDACTED] was ordering him to leave, his refusal to do so could have had tragic consequences.

Once Assistant Sheriff [REDACTED] determined what Department policies Appellant violated, the case and his findings were presented to the Case Review Panel, a reviewing board comprised of three Assistant Sheriffs. The members of the Case Review Panel also read the

entire investigative file, including a review of video and audio evidence. The panel unanimously supported Assistant Sheriff [REDACTED] determination of the facts and decision to discharge Appellant.

**B. The Hearing Officer's Findings Are Supported by the Evidence**

Joseph Scully was the Hearing Officer appointed by the Commission to hear this matter. He listened intently to the testimony presented at hearing and conducted a careful review of all evidence. Each of his findings of fact are supported by the compelling, credible evidence presented by both the Department and Appellant at hearing and demonstrate that he understood and considered the arguments made by Appellant. Mr. Scully rejected the unsubstantiated claims of Appellant and made an explicit finding that [REDACTED] testimony was credible<sup>3</sup> and corroborated by the videos, documentary evidence and testimony of other witnesses.

**C. The Appellant Has Failed to Establish the Hearing Officer Erred**

In carrying out his duties, Mr. Scully ruled on objections, determined what evidence was admissible, and observed witnesses testify in order to assess credibility. The Hearing Officer's report provides a thorough and thoughtful analysis of the evidence and explanation for his findings and recommendation. Appellant clearly disagrees with the Hearing Officer's conclusions. However, in his objections to the Hearing Officer's Findings and Recommendation, Appellant has merely regurgitated his closing brief. Other than expressing general disagreement with the Hearing Officer's conclusions, Appellant's counsel has failed to articulate any specific error which would justify overturning the findings or recommendation.

**V.**

**DISCHARGE IS THE ONLY APPROPRIATE DISCIPLINARY PENALTY**

The Department's *Guidelines for Discipline* represents the Sheriff's philosophy regarding discipline. Regarding progressive discipline, it states:

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<sup>3</sup> The hearing officer explicitly found that her demeanor while testifying was "consistent with a finding of credibility" [HO 15].

1        *There are some acts of misconduct, which by their nature, are not appropriate*  
2        *for progressive discipline. These are conduct problems which the employee*  
3        *should have reasonably known to be unacceptable, without specific notice from*  
4        *the Department, or which are generally socially unacceptable.*

5        *Such behavior may include, but is not limited to ...dishonesty...violent*  
6        *behavior... or behavior which is illegal or places the individual or the*  
7        *Department in violation of federal, state or local laws, or court orders.*

8        *These acts may result in relatively harsh discipline, even discharge, without the*  
9        *use of progressive discipline.*

10       The conduct of Appellant falls into this category. The law has established that “peace  
11 officers must conduct their personal lives in a manner that is beyond reproach” and  
12 “disrespectful and danger-inciting behavior should not be tolerated”. [Richardson v. City and  
13 County of San Francisco (2013) 214 Cal.App.4<sup>th</sup> 671, 700.] Our courts have also consistently  
14 emphasized that “an officer’s actions must be above reproach” [Flowers v. State Personnel  
15 Board (1985) 174 Cal.App.3d 753, 759) and a law enforcement agency “must have total  
16 confidence in the behavior of their officers” [Fout v. State Personnel Board (1982) 136  
17 Cal.App.3d 817, 821]. Further, “[p]olice officers are routinely disciplined for off-duty conduct  
18 that is inconsistent with their special obligations.” [People v. Owens (1997) 59 Cal.App.4<sup>th</sup>  
19 798, 803].

20       The County of Los Angeles Civil Service Rule 18.02A specifically provides for a  
21 permanent employee being discharged. Rule 18.031 states that “[g]rounds for discharge...may  
22 also include any behavior or pattern of behavior which...is unbecoming a county employee or  
23 any behavior or condition which impairs an employee’s qualifications for his or her position  
24 for continued county employment.” This Rule also provides that “...such grounds may include  
25 failure to exercise sound judgment...” which, the Department submits, is very applicable here.

26       After evaluating the evidence, the Hearing Officer concluded that Appellant did *not*  
27 conduct himself in a manner the public or Department expects of a law enforcement officer,  
28 and found the penalty of termination to be appropriate [HO report page 20 and Conclusion of  
Law No. 5].

      After considering the facts overwhelmingly established by the credible evidence, the  
Department has proven that Appellant’s conduct did not conform to Department’s

1 expectations, and Appellant has refused to accept responsibility for his conduct. The various  
2 factors in aggravation and mitigation have been considered, and Appellant's conduct evaluated  
3 in light of the Department's *Guidelines*. Absent extenuating circumstances, Department policy  
4 mandates discharge for making false statements during a departmental investigation. Society  
5 cannot countenance a law enforcement officer who lies. No extenuating circumstances exist in  
6 this matter which would warrant anything less than discharge. Appellant committed multiple  
7 acts of misconduct, and then repeatedly lied during his subject interview, even after being  
8 shown video evidence which disproved his explanations. Appellant has violated the trust of  
9 the County and Department, and discharge is the only appropriate disciplinary penalty.

10 VI.

11 CONCLUSION

12 The Hearing Officer concluded that the Department, through the credible testimony of  
13 witnesses and the documentary evidence, had proven by a preponderance of the evidence the  
14 facts that formed the basis for the discharge of Appellant. Furthermore, the Hearing Officer  
15 agreed that Appellant's misconduct warranted discharge. Therefore, the Department  
16 respectfully requests the Commission to overrule Appellant's Objections and adopt the  
17 recommendation of the Hearing Officer as its final decision.

18  
19 DATED: May 1, 2018

JIM McDONNELL,  
SHERIFF

20  
21  
22 By: 

CHRISTINE ROAM, Sergeant  
Advocate for Respondent,  
COUNTY OF LOS ANGELES



# CIVIL SERVICE COMMISSION

## COUNTY OF LOS ANGELES

COMMISSIONERS: DENNIS F. HERNANDEZ • NAOMI NIGHTINGALE • STEVEN AFRIAT • JOHN DONNER • Z. GREG KAHWAJIAN  
STEVE CHENG, INTERIM EXECUTIVE DIRECTOR

April 11, 2018

### NOTICE OF CIVIL SERVICE COMMISSION

### AGENDA ITEM

SUBJECT: **CAREN MANDOYAN (16-276) – FINDINGS AND OBJECTIONS**

Notice is hereby given that the Los Angeles County Civil Service Commission ("Commission") will consider the above referenced matter at its regular meeting on Wednesday, **May 16, 2018**. You or your representative are welcome to attend. Although your presence is not mandatory, attendance at the meeting will give you or your representative an opportunity to clarify your position or answer any questions the Commission might have.

Commission Meetings are held in Room 522 in the Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, California 90012, beginning at 9:30 a.m.

A handwritten signature in black ink, appearing to read "Steve Cheng", is written over a horizontal line.

Steve Cheng  
Interim Executive Director

c: Caren Mandoyan  
Michael Goldfeder  
Christine Roam

Michael A. Goldfeder (SBN: 162381)  
Attorney at Law  
400 Continental Boulevard, 6th Floor  
El Segundo, CA 90245  
Tel: (310) 374-7011

Attorney for Appellant,  
Caren Mandoyan

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CIVIL SERVICE  
COMMISSION

BEFORE THE CIVIL SERVICE COMMISSION  
FOR THE COUNTY OF LOS ANGELES

IN THE MATTER OF THE DISCHARGE OF  
CAREN MANDOYAN

CASE NO: 16-276

Assigned to: Joseph Scully,  
Hearing Officer

Date: July 24, 25, 26,  
September 27, 29, 2017

Time: 9:00 a.m.

Place: Room 522

**CAREN MANDOYAN'S OBJECTIONS  
TO THE FINDINGS OF FACT;  
CONCLUSIONS OF LAW; AND  
RECOMMENDATIONS OF HEARING  
OFFICER JOSEPH SCULLY**

After reading the decision of the Hearing Officer assigned to hear this matter, it is doubtful any of the factual or impeachment evidence received at the hearing was even considered. It was either overlooked, discarded, or totally ignored. Therefore, the Appellant submits his entire closing argument with the expectation that perhaps the Commission might possibly choose to read it as a precursor to examining the entire five (5) days of this Hearing.

Here is an example of a witness that was glossed over in this decision: The testimony of Lieutenant Lowana Haselrig of the LASD, a twenty-nine (29) year veteran of the LASD, was a Lieutenant at West Hollywood from 2007-2013 where she was a shift Watch Commander and supervised both Deputy Mandoyan and [REDACTED] in that capacity. Lieutenant Haselrig summed up the character of Deputy [REDACTED] best when she stated: *"She's a Con Artist."* The Hearing Officer inquired Sua Sponte asking her (Haselrig) what she meant by the phrase: *"She's a Con Artist."*, and she said: *"Someone who would do anything to get what they want."* The Appellant's closing argument is set forth intact as follows:

When not just one, but two, highly experienced DDA's from the Los Angeles County District Attorney's Office Domestic Violence Unit declined and chose not to file any criminal charges based on the extremely stale allegations manufactured by Deputy Sheriff [REDACTED] [REDACTED] the Respondent should have instantly yielded to that sound determination. Instead of failing to heed the clear and obvious message those 52-years of collective prosecutorial experience suggested and underscored in their well thought out and reasoned decision not to file any criminal charges against Deputy Sheriff Caren Mandoyan, the Respondent took an entirely misguided and twisted path by arrogantly concluding that they knew more than two expert and highly seasoned DV Prosecutor's; DDA Linda Lotfield SBN 127507, and DDA Jamie Garrison, SBN 157070 [Department's Exhibit 6: Page-13]

Even Inspector Clouseau of the Pink Panther Movie series would have rightfully deduced after listening to the incessant giggling and salty language of Deputy Sheriff [REDACTED] in her Interview with Detectives Danowitz and Humphrey from the El Segundo Police Department ("ESPD") that there never was any crime at all. It was all just a joke. How any rational individual could conclude otherwise after listening to her constant laughter and great glee on display while having a captive audience attending her make believe fantasy is tragically pathetic. Yet Sergeant [REDACTED] of the Respondent's IAB Unit decided to pursue a case that never was with absolute gusto. Forget the reality that this was a non-existent

1 event concocted by a very troubled individual as it was devoid of any genuine or legitimate  
2 facts from the beginning. But Sergeant [REDACTED] chose to put into action this utterly  
3 fictitious spectacle by using the age old formula: "*Falsehood flies, and the Truth comes*  
4 *limping after it.*"

5 The DDA's from the LA County District Attorney's Office figured out the true  
6 machinations of this [REDACTED] [REDACTED] scam faster than the speed of light and did so without the  
7 volumes of additional information presented to the Respondent that exposed [REDACTED] [REDACTED]  
8 contrived charade. In fact, the singular, obvious, and only reasonable conclusion that could be  
9 drawn from that ESPD Interview of Deputy Sheriff [REDACTED] [REDACTED] is that this was nothing more  
10 than her version of *Domestic Vengeance*. A tool for a dissatisfied or annoyed individual in a  
11 relationship who then solicits professional law enforcement officers and Detectives under false  
12 pretenses as their personal weapon of choice in order to inflict wrath on a former dating  
13 partner, commonly known as *Domestic Revenge*.

14 Casting aside for the moment that a blatantly false and contrived police report was  
15 made by Deputy Sheriff [REDACTED] [REDACTED] a ten (10) year veteran of the Los Angeles County  
16 Sheriff's Department who certainly ought to know better, but the actions undertaken by the  
17 world's largest Sheriff's Department ("Respondent") through their IAB Unit against the  
18 Appellant, Deputy Sheriff and Field Training Officer ("FTO") Caren Mandoyan can only be  
19 described as shameful. It became patently obvious throughout these proceedings that the IAB  
20 Investigator Sergeant, now Lieutenant, [REDACTED] conducted: "*a shoddy, one sided, and*  
21 *incomplete Investigation.*" His candid admissions when testifying under cross-examination.  
22 But the lengths he and the Respondent went to in trying to smear the sterling reputation of a  
23 stalwart Deputy Sheriff and FTO like Caren Mandoyan is outlandish.

24 Point in fact is the obviously skewed and completely jaundiced photograph of a sliding  
25 glass door that Sergeant [REDACTED] so proudly took himself but is all but unrecognizable.

26 **[Department's Exhibit 25: Page-55]** One would expect that any Investigation ought to be

1 conducted professionally and honorably by gathering all of the relevant evidence and pertinent  
2 documents so that a finder of fact can engage in a legitimate *search for the truth*. Because of  
3 this complete lack of integrity, the Appellant was improperly tasked with having to provide the  
4 Hearing Officer with the plain unvarnished truth by introducing clear-cut decipherable  
5 photographs of that very same sliding glass door for proper context. (**Appellant's Exhibit 52:**  
6 **Pages-3, 4**) Unfortunately, when evidence is intentionally altered by the IAB Investigator,  
7 along with crucial pages omitted from a TRO Superior Court Filing that were deliberately  
8 extracted by the Advocate for the Respondent in their very own document, [**Department's**  
9 **Exhibit 21: TRO**] it simply erodes and eliminates all integrity from not only the IAB  
10 Investigation itself, but cripples and undermines the Civil Service proceedings by offending  
11 Due Process as a result. Despite the Respondent's flagrant redaction of Superior Court  
12 Records Filed and available to the Public, the Appellant once again was forced to overcome the  
13 Integrity deficit that infected this IAB investigation from its inception, then compounded by  
14 the brazen and deceitful Advocacy shenanigans in shredding those crucial materials to avoid  
15 them from being provided to the Hearing Officer. Fortunately, the Appellant recognized these  
16 *corrosive litigation tactics* in advance by procuring and presenting those crucial missing pages  
17 from [REDACTED] Taylor's TRO that were subsequently marked and admitted into evidence at the  
18 Hearing as **Appellant's Exhibit 60: Pages-1, 2**.

19 Such antics by the Respondent's Advocate in *sanitizing* a handcrafted document filed in  
20 the Superior Court by Deputy Sheriff [REDACTED] and then intentionally removing pages  
21 from that legal pleading is *misconduct sanctionable as evidence tampering* that was purposely  
22 being done in order to mislead the Hearing Officer. Such a contemptible offense would result  
23 in an immediate referral to the State Bar of California for Discipline if done by an actual  
24 Attorney. Moreover, the Respondent churned up an absolutely fabricated case of *dating drama*  
25 which is a pathetic excuse to terminate a hard working FTO. Even more shocking was the  
26 insinuation that permeated this Hearing with no basis in fact regarding the Appellant's FTO

1 assignment at South Station that he recognized with pride in accomplishing such a Nobel  
2 achievement by implementing the unit's mascot as skin art. Given that the question of a  
3 "station tattoo" was incessantly brought up multiple times by the Respondent when it was not  
4 even a charge being asserted in their letter of imposition, [Department's Exhibit 3]  
5 illuminates their real motive in proceeding with an absolutely meritless case of *dating drama*,  
6 and thereby exposing their true and ulterior motive with a termination case that they  
7 themselves knew was a fraud from day one but callously pursued it solely because the  
8 Department's Advocate unilaterally felt the Appellant is part of a "*clique*." A meritless  
9 allegation that has no factual basis which explains why it was never brought as an actual  
10 charge against the Appellant as there is no policy violation. But instead, the Respondent went  
11 to great lengths to create a *hostile misperception* and thereby *stain* Deputy Mandoyan with the  
12 *stigma of intolerance* in a resolute effort to *bias* the Hearing Officer against him. What's  
13 crystal clear though is that once the Respondent's case started to fall completely apart with  
14 their very first witness, IAB Sergeant [REDACTED], and the contrived charges they brought  
15 were receiving no better traction with their subsequent witnesses, they quickly retreated and  
16 began engaging in a cowardly smear campaign by tarring the Appellant with as broad a bush as  
17 they could find in the hopes of salvaging something from their futile efforts.

18 Which now illustrates why the Department's Advocate would *coach* [REDACTED] [REDACTED] for  
19 six (6) hours given that her false police report was summarily rejected by the DA's Office who  
20 correctly concluded her salacious claims were unimpressive. More disturbing though is the  
21 *smoke and mirrors* stratagem undertaken by the Department's Advocate and IAB Sergeant  
22 who engaged in unprecedented *evidence destruction and manipulation* that completely  
23 highlighted their dishonest and malicious production. After that parlor trick didn't go as  
24 planned they fell back into their old habits by asking Lieutenant [REDACTED] assigned to  
25 Homicide Bureau if he was aware that the Appellant had a "Reaper" tattoo? At which point  
26 the Hearing Officer inquired of Lieutenant [REDACTED] "What would be his impression of someone

1 who had a "Reaper" tattoo?" To which Lieutenant [REDACTED] replied: "It would mean that  
2 individual worked a long time at Lennox/South LA Station and that they were a *hard worker*."  
3 That completely halted their nonsensical issue regarding the Appellant's *innocuous skin art*.

4 As will be addressed in greater detail infra, the patently make-believe false domestic  
5 abuse initiated by [REDACTED] [REDACTED] at the sole behest of the LASD in order to bolster her  
6 meritless Policy of Equality (POE) claim that also fell short of the mark, as did her TRO  
7 Application she voluntarily and swiftly dismissed on her own accord, was nothing more than  
8 her illusory *dating drama revenge* that she was desperately trying to transmute into a reality  
9 show for the Respondent and their IAB Sergeant who himself was unable to distinguish  
10 between: "*Lies and Damn Lies*."

#### 11 APPELLANT'S SUMMARY OF WITNESS TESTIMONY

12 IAB Sergeant/Lieutenant [REDACTED]

13 The first witness called by the Respondent, Sergeant [REDACTED], was the  
14 individual responsible who handled the IAB Investigation involving [REDACTED] [REDACTED] dubious  
15 allegations. Essentially all Sergeant [REDACTED] did was interview various witnesses brought to  
16 his attention by the complaining witness in this case, Deputy Sheriff [REDACTED] [REDACTED] Other than  
17 *spoon feeding* these individuals leading questions in his purported interviews, no actual  
18 investigation ever occurred to corroborate or refute any information provided by [REDACTED]  
19 [REDACTED] co-workers and friends. In fact, Sergeant [REDACTED] assiduously avoided doing any  
20 follow up on the obvious flaws and glaring inconsistencies the size of lunar craters with all of  
21 these witnesses' testimony, especially [REDACTED] [REDACTED] Here are some of the more noteworthy  
22 examples of the massive deficiencies with his *extremely incompetent investigation*:

- 23 1. He *never interviewed Lieutenant Wiard* who [REDACTED] [REDACTED] first contacted about  
24 these made up claims on June 23, 2015 and had him fill out for her the Policy of  
25 Equality ("POE") Form. (Appellant's Exhibit 60: Pages-1, 2). Had he bothered  
26 to engage in any rudimentary follow up and conduct an actual investigation with

1 Lieutenant Wiard regarding that POE document he could have asked him: "Why is  
2 there nothing about alleged domestic violence ("DV") contained in that POE  
3 document? Did [REDACTED] [REDACTED] ever mention DV?; Did [REDACTED] [REDACTED] provide you  
4 the information regarding *dating/co-habiting relationship that ended in December*  
5 *2014?*; Did you ever ask [REDACTED] [REDACTED] to provide her cell phone and text records to  
6 establish that she was *contacted numerous times via text and phone?*; Did you ask  
7 [REDACTED] [REDACTED] to provide the names of: "*contacted co-workers of Amber [REDACTED]*  
8 *attempting to keep track [REDACTED] [REDACTED] while she was working?*;

9 2. Or do any follow-up at all on the obviously contrived and nonsensical entry in the  
10 POE document whereby [REDACTED] [REDACTED] asserted: "Carl Mandoyan said he called  
11 friends at SVB ("Special Victim's Bureau") preventing [REDACTED] [REDACTED] from getting  
12 a position at SVB? ([REDACTED] [REDACTED] stated she missed the filing deadline for SVB  
13 and therefore did not put in an application for the position.)") Did Sergeant [REDACTED]  
14 ever inquire of anyone at SVB? Wouldn't that have put to the test [REDACTED] Taylor's  
15 *grandiose assertion* that Deputy Mandoyan *knew people in high places in the*  
16 *Department?*;

17 3. Never made any effort to obtain "MDT" Logs (Mobile Data Transmissions) from  
18 West Hollywood Station ("WHD") to authenticate the obvious nonsensical event  
19 claimed by [REDACTED] [REDACTED] and reported to ESPD Officer Marco Lemus on July 14,  
20 2015: "On one occasion, while they were both on duty, he took her unit keys and  
21 left. The victim was stranded and unable to respond to a potential call."

22 [Department's Exhibit 6, Page-3];

23 4. Nor bothered to do any follow up when Deputy [REDACTED] [REDACTED] further embellished  
24 that fake story in her next interview with Detectives Danowitz and Humphrey from  
25 the ESPD on July 20, 2015 when she said: "...And he did. He came out there, and  
26 he friggin' wiggled out because I wouldn't give him my cell phone. And so

1 he...There's nothing on it. Like, Dude, what is your problem? So he took the keys  
2 out of my radio car...I was left with my radio car in a parking lot with no keys...I  
3 want to say like maybe like 15, 20 minutes...Well, I typed one of my partners and  
4 said: "Hey, do you have an extra key? An extra set of keys?" [Department's  
5 Exhibit 5, Pages-4, 5];

- 6 5. Then when IAB Sergeant [REDACTED] was interviewing Deputy Sheriff [REDACTED]  
7 himself for her first IAB interview, which was now the *third iteration* of this:  
8 "Taking the keys from the ignition of my radio car story," she mentions for the *very*  
9 *first time* that she had typed: "[REDACTED] for the extra set of keys. And you said by  
10 the time he had replied to you..." "Yeah, I already had my stuff back, so."

11 [Department's Exhibit 7, Pages-9 through 13] Shockingly, even while in  
12 possession of three (3) fluctuating versions of this manifestly false event, Sergeant  
13 [REDACTED] never bothered to obtain any of the MDT Logs between Deputy Sheriff  
14 [REDACTED] and Deputy [REDACTED] to corroborate or *refute* this  
15 absurd occurrence. His excuse made while testifying at the Hearing was: "He  
16 didn't have the date of the event (Surprisingly neither did [REDACTED] to go  
17 retrieve those records because the Department has an *old dot matrix system*." Last I  
18 checked *dot matrix* was a printing application, not a software program for  
19 recovering MDT Logs.

- 20 6. Even Sergeant [REDACTED] obviously didn't believe the underpinnings of this *fish tale*  
21 otherwise he would have asked [REDACTED] whether or not Caren Mandoyan was  
22 "ON DUTY" or "OFF DUTY" in any of these three sham stories that were being  
23 told to "four" different individuals on three occasions: ESPD Officer Marco  
24 Lemus; ESPD Detectives Danowitz and Humphrey; and now IAB Sergeant  
25 [REDACTED] *But searching for the truth was never his agenda.*

- 1 7. Why didn't Sergeant [REDACTED] obtain the GPS records from Deputy Mandoyan's  
2 assigned patrol vehicle at Lennox/South LA Station to ascertain if he ever was in  
3 West Hollywood jurisdiction as opposed to being his mandated patrol area? Given  
4 that FTO Mandoyan was training newly assigned patrol trainees wouldn't that have  
5 been another resource to refute this fictional story by [REDACTED] [REDACTED] Any reason  
6 that wasn't done by Sergeant [REDACTED] Probably because a *Hard Worker* would  
7 never be engaged in such an impetuous frolic as he's too busy attending his patrol  
8 assignment at Lennox/South LA Station!
- 9 8. Never did any follow up investigation with the purported Landlord of Deputy  
10 Sheriff [REDACTED] [REDACTED] to ascertain if the statement she [REDACTED] made in her IAB  
11 interview on June 24, 2016 was also a lie: "After that incident, my landlord came to  
12 my house and said she got a lot of complaints from the other tenants and she said,  
13 you know, if something like this happens again, I'm going to have to ask you to  
14 move out..." [Department's Exhibit 7, Page-47]
- 15 9. Nor did Sergeant [REDACTED] conduct any follow up investigation with the purported  
16 Landlord of Deputy Sheriff [REDACTED] [REDACTED] to ascertain if the statement she [REDACTED]  
17 made in her IAB interview on June 24, 2016 was yet another acute lie; Did you  
18 have to pay to have that door repaired? "It was taken out of my security deposit."  
19 Would any landlord make a real crime victim pay for damage caused by a suspect?  
20 Did [REDACTED] [REDACTED] tell her Landlord she had made a police report? What did  
21 [REDACTED] [REDACTED] say the reason was for this damaged door? Why not ask her  
22 landlord? Was Sergeant [REDACTED] afraid that answer would destroy the credibility  
23 of [REDACTED] [REDACTED] [Department's Exhibit 7, Page-47] Isn't Sergeant [REDACTED]  
24 supposed to be conducting an honest investigation? Why not find out answers to  
25 these questions from the individuals purportedly making them as opposed to relying  
26 on multiple hearsay from an integrity challenged "Con Artist?" (Lieutenant

Haselrig's description of [REDACTED] Isn't that how a proper investigation is done?

10. Sergeant [REDACTED] after being provided the "anonymous" text messages from the El Segundo Police Department and going over them with [REDACTED] didn't follow up at all on the connection between [REDACTED] and the fact that [REDACTED] had contacted [REDACTED] out of the blue years later to tell her [REDACTED] that she [REDACTED] was now dating Deputy Mandoyan. Why not explore that odd circumstance? [Department's Exhibit 7, Pages-72 through 76] Even odder was the fact [REDACTED] had [REDACTED] serve Deputy Mandoyan with a TRO while "[REDACTED] watched from down the street." Wasn't that part of [REDACTED] Domestic Revenge? Why not have the ESPD serve Deputy Mandoyan? If [REDACTED] [REDACTED] was afraid of Deputy Mandoyan why be in the same proximity when he was being served by another ex-girlfriend? What was the point of that? Didn't this bizarre scenario cause Sergeant [REDACTED] to realize that perhaps this was all a ruse? A scam? Grade School Retaliation? Joint ex-girlfriends getting even with a common ex-boyfriend? But the fact Sergeant [REDACTED] a week later when he interviewed Sergeant [REDACTED] on June 30, 2016 regarding the derogatory text message she received regarding her fiancée (Deputy [REDACTED] [REDACTED] having a three-way sexual tryst with [REDACTED] [REDACTED] and another male deputy, why didn't he ever bring up the name [REDACTED] [REDACTED] Why didn't he ever Investigate any relationship or possible connection with [REDACTED] and anyone else in this case? Wasn't he even curious about that connection? Didn't he find it odd that [REDACTED] Arresigor would receive an *anonymous text* message from someone she doesn't even know (Mandoyan)? Isn't that what competent Investigators are tasked to do? Ask the logical fact finding questions? When Sergeant [REDACTED] was asked about whether she knew [REDACTED] [REDACTED] under cross-examination at the

Hearing, her facial expression showed a look of total horror and disgust then she articulated: "*She was involved in all of this?*"

11. Then [REDACTED] went on to say in greater detail how [REDACTED] [REDACTED] had entangled herself in her marriage and custody cases with her ex-husband who [REDACTED] had subsequently married, and how [REDACTED] had testified in those personal Family Law matters and had reason to lash out at her [REDACTED] with such a vile and venomous anonymous text message. When [REDACTED] [REDACTED] said: "That she ([REDACTED]) had to testify as a character witness for her ex-husband in court because [REDACTED] was alleging a false DV on him. She said it was very upsetting because the DV where [REDACTED] assaulted her ex-husband and was arrested, occurred in front of her [REDACTED] son who video-taped the incident which helped her ex-husband put [REDACTED] in jail with her ex-husband obtaining a restraining order against [REDACTED] immediately after.

12. Yet Sergeant [REDACTED] intentionally chose not to connect these dots himself even though he was told by [REDACTED] [REDACTED] a week earlier in her IAB interview she thought it was [REDACTED] "I just, because of the, just the grammar of all these." [Department's Exhibit 7, Pages-67-68] Why not Investigate that lead too? Afraid of actually finding the truth? Why decline to follow up on leads and evidence?

13. Sergeant [REDACTED] also ignored the fact [REDACTED] [REDACTED] said in her IAB Interview: "I thought it was [REDACTED] that sent it to me..." He also ignored the further fact that when confronted in person by [REDACTED] [REDACTED] Deputy Mandoyan told her it wasn't him. [Department's Exhibit 7, Pages-65-66] Isn't an Investigator supposed to follow up on this type of information handed directly to you on a silver platter?

14. But then Sergeant [REDACTED] never did any follow up on the phone records provided to him during the interview of Deputy Mandoyan showing that he received a two (2) minute phone call from an *unavailable/blocked phone number* on July 26, 2017

1 with both [REDACTED] and [REDACTED] on that call jointly  
2 laughing about the look on his (Mandoyan) face when he was served with [REDACTED]  
3 TRO by [REDACTED] (Appellant's Exhibit 50)

4 15. Sergeant [REDACTED] never pursued any leads when they were handed to him by  
5 Deputy Mandoyan in his IAB Interview when he was asked: And so why would she  
6 take a picture of your car? Deputy Mandoyan said: "Because she thought I was at  
7 Howl at the Moon, but I was at Saddle Ranch and she drove around and she saw my  
8 car and she took a picture of it. And I told her, I go, I'll come out of Saddle Ranch.  
9 I was there with a friend of mine and so we came out, she talked, we talked a little  
10 and hung out and then we left." Who was the friend that you were there with?  
11 "[REDACTED] Is he Department Member? "Yes."... Where does [REDACTED]  
12 work? "South LA." [Department's Exhibit 17, Pages-61-62]

13 16. Sergeant [REDACTED] purposely ignored doing any follow up as that would have  
14 refuted this entire *taking a picture of Deputy Mandoyan's car nonsense*. Why not  
15 conduct an interview with [REDACTED] No doubt because it would result in the  
16 truth being generated just like it was when he interviewed Deputy [REDACTED]  
17 [REDACTED] who shattered the: *bogus taking my patrol car keys while on duty story* of  
18 [REDACTED] Why was Sergeant [REDACTED] intentionally protecting the patently  
19 made up stories of [REDACTED] Why obfuscate the truth? Why avoid following  
20 up on real leads to get the truth? What was Sergeant [REDACTED] actual agenda?  
21 Was that the Respondent's true agenda? Not to find the truth? By ignoring all of  
22 these obvious leads?

23 17. Last, but certainly not least, wasn't Sergeant [REDACTED] even the least bit curious as  
24 to why highly seasoned DV Prosecutor's; DDA Linda Lotfield SBN 127507, and  
25 DDA Jamie Garrison, SBN 157070 immediately dropped this case? What did they  
26 know? What did they suspect about the credibility of Deputy Sheriff [REDACTED]



1 to believe the testimony of an individual who lies when prompted by her Cousin, [REDACTED]  
2 [REDACTED] Or perhaps that *innovative testimony* was provoked by her two sessions with the  
3 Respondent's Advocate with one taking an hour and the other a mere 20 minutes.

4 Sergeant [REDACTED] [REDACTED]

5 Other than receiving a nasty anonymous text message that was subsequently found to  
6 have come from [REDACTED] [REDACTED] [REDACTED] Sergeant [REDACTED] cracked the case for Sergeant  
7 [REDACTED] from the witness chair when she was asked on cross-examination if she knew [REDACTED]  
8 [REDACTED] [REDACTED] After the look of utter revulsion and fury that defined her face and body  
9 language after hearing [REDACTED] name, she stated: "She was involved in this?" Making the  
10 rest of her testimony a soliloquy on the evils and despicable conduct of [REDACTED]  
11 [REDACTED] (Refer to bullet points 10, 11 under the Sergeant [REDACTED] Heading)

12 [REDACTED] [REDACTED] [REDACTED]  
13 Can best be described as: *The straw that stirs the drink*. After all, it was later  
14 discovered that *she was the one sending all of the anonymous text messages*. The caustic  
15 impact of those texts is what triggered the *Theater of Deception* that was launched by Deputy  
16 Sheriff [REDACTED] [REDACTED] on June 23, 2015 with her misguided POE (Policy of Equality) missile  
17 that was flung in the direction of Deputy Mandoyan. All of which could have been resolved  
18 and uncovered as nothing more than third grade elementary school infantile payback by  
19 Deputy Sheriff [REDACTED] [REDACTED] had there been even just a modicum of competence from the  
20 IAB Investigator tasked with this incident. Like putting 2 and 2 together and coming to 4  
21 when you're handed both deuces, or perhaps asking Sergeant [REDACTED] [REDACTED] if she knew  
22 [REDACTED] [REDACTED] [REDACTED]

23 Instead, this adolescent nonsense was pumped up like the Goodyear Blimp into the next  
24 *Case of the Century* that made Alice in Wonderland and the trip down the Rabbit Hole look  
25 like an Amish Buggy ride on a Sunday morning. The bulk of [REDACTED] [REDACTED] [REDACTED]  
26 testimony consisted of: "Not that I recall; Hard time recalling; I don't recall", probably related

1 to her being on quite an array of medications that impacted her ability to remember these  
2 events back when they were occurring in real time. Making it even more remarkable that she  
3 was able to have enough clarity of thought to type up and send quite a few nasty and  
4 derogatory text messages during those very brief and selective moments when she was lucid.  
5 Although she did say in her testimony when asked on cross-examination that it: "*Was*  
6 *Possible*" she sent text messages. [REDACTED] also did admit she herself was served with a TRO as  
7 part of an actual DV case by her husband who coincidentally was [REDACTED] Arresigor's Ex.  
8 Interestingly, [REDACTED] refused to answer the question as whether she was committed to a  
9 psychiatric facility for a 72-hour Welfare and Institutions Code Section 5150 evaluation and  
10 observation hold. Perhaps that explains her reason and motivation for sending out all of these  
11 anonymous text messages.

12 While it was conclusively established that she [REDACTED] was the culprit behind all of  
13 this drivel as Deputy Sheriff [REDACTED] [REDACTED] said in her interview with IAB Sergeant  
14 [REDACTED] on June 29, 2016: "And then later we found out who that person was who was  
15 sending those messages." Who was that? It's [REDACTED] [REDACTED] best friend that used to, well,  
16 not used to, but at the time was dating Carl Mandoyan." And who was that? "[REDACTED] Plent."  
17 [Department's Exhibit 8, Page-7]

18 Notably, information in possession of Sergeant [REDACTED] [REDACTED] the day before he  
19 interviewed Sergeant [REDACTED] [REDACTED] on June 30, 2016. [Department's Exhibit 9] But he  
20 copiously chose instead to isolate this *Case Cracking* information in order to conceal the truth  
21 which he had no interest in exposing, let alone finding, as it didn't suit the Respondent's  
22 purposes. Because why let the truth interfere with the predetermined outcome of an IAB  
23 Investigation when the Sergeant running it can censor those facts with: "*a shoddy, one sided,*  
24 *and incomplete Investigation,*" since they don't fit into his agenda to terminate Deputy Sheriff  
25 Caren Mandoyan from his position as a *Hard Working FTO at Lennox/South LA Station*.  
26 Apparently for nothing more than having the temerity to have etched onto his skin the Station

1 Mascot for which there is no violation of policy. Nor a charge in the imposition of discipline  
2 letter. Although, for some inexplicable reason it certainly offended the Respondent's Advocate  
3 who kept asking about it incessantly. Again, simply appalling conduct.

4 Lieutenant [REDACTED]

5 A twenty-seven (27) year veteran of the Respondent who was assigned as the Watch  
6 Commander at West Hollywood Station during the time period both [REDACTED] and Deputy  
7 Mandoyan worked there in patrol. She was called to the stand by the Advocate for the  
8 Respondent. What Lieutenant [REDACTED] had to say about [REDACTED] conduct and behavior  
9 from the witness stand blew a hole wider than the Grand Canyon in [REDACTED] entire make-  
10 believe story about Mandoyan telling her not to go to briefings, etc. [REDACTED] said that [REDACTED]  
11 [REDACTED] refused to comply with directives when she first arrived at the Station as a field trainee  
12 and had an attitude. "[REDACTED] was constantly late for work and didn't get along with other  
13 Deputies at the Station. She always had some personal life issues and various excuses because  
14 it was always something with that girl." When asked by the Respondent the influence Deputy  
15 Mandoyan allegedly exerted over [REDACTED] [REDACTED] quickly responded by saying:  
16 "Deputy Sheriffs are responsible for themselves."

17 But the strongest words of Lieutenant [REDACTED] were couched in the form of her opinion  
18 of [REDACTED] when she unequivocally said: "[REDACTED] is not truthful or reliable." Hardly the  
19 bell ringing character endorsement for an individual feigning make-believe crimes and other  
20 misconduct that never in fact occurred as she [REDACTED] claimed in her false police report, POE  
21 Claim, and TRO application. After Lieutenant [REDACTED] stark revelation that [REDACTED]  
22 was not "Truthful or Reliable," the Hearing Officer himself asked her: "Would you say Deputy  
23 [REDACTED] has an Integrity problem?" To which Lieutenant [REDACTED] said: "Yes. Definitely."

24 Lieutenant [REDACTED] also recalled an occasion when Deputy Mandoyan happened to be  
25 at the Station and helping the watch deputy and [REDACTED] inside the WHD Station desk  
26 area during a period when it was quite hectic, she said: "While everyone appreciated Carl

1 helping us out since he was no longer assigned to WHD Station, the personnel needed to learn  
2 how to do their jobs themselves." Even though Deputy Mandoyan was a very good FTO who  
3 worked quite hard and did his job with the utmost of integrity, the Deputies now working at the  
4 station had to learn for themselves how to handle patrol problems. She also said [REDACTED]  
5 would constantly be on the phone with Deputy Mandoyan asking him how to handle calls,  
6 write reports and coordinate her calls. Lieutenant [REDACTED] said she would see [REDACTED] on  
7 calls for service in the field, then calling him (Mandoyan) and asking for help. [REDACTED] told  
8 her that she understands Mandoyan is a good cop, but that that he's no longer here and she  
9 needs to learn how to do her job herself.

10 Assistant Sheriff [REDACTED]

11 Was the decision maker for the Respondent who signed off on the termination  
12 recommendation of Deputy Mandoyan. It was noteworthy that although he testified he  
13 reviewed the entire 501-page IAB Investigation packet cobbled together by Sergeant [REDACTED]  
14 for some strange reason he conceded that he didn't listen to the actual audio CD of [REDACTED]  
15 [REDACTED] as she laughed, cussed, and giggled during her interview with the ESPD Detectives.  
16 Nor any of the other audio CD's. When asked if that would have made a difference in his  
17 decision to terminate Deputy Mandoyan he said: "No." That answer struck me as very odd  
18 given that the Assistant Sheriff did say that: "Deputy Mandoyan had an impeccable record with  
19 the Department. But DV cases are dangerous and volatile as guns are involved." Another  
20 startling comment given the fact no weapons were alleged in this make-believe account by  
21 [REDACTED] but apparently the Assistant Sheriff is of the opinion that any mendacious  
22 allegation brought against a Deputy Sheriff automatically invokes a *potential for violence*. He  
23 too never contacted the DDA's in this case although he has the ability to do that on his own  
24 accord had he chosen to do so.

25 While he made his decision to terminate based on the words [REDACTED] it was  
26 extremely odd he added that her reputation on the Department was: "He knows that she's a bad

1 employee, has credibility issues, does not get along with her partners and sleeps around a lot.”  
2 Not certain how he came to his termination conclusion based on those diametrically conflicting  
3 comments? Making his testimony even more convoluted when he determined that Deputy  
4 Mandoyan was not honest and forthright in his IAB Interview and he believed [REDACTED] [REDACTED]  
5 allegations that Mandoyan was the person sending those *anonymous text messages*. What?  
6 Causing anyone to think that in addition to not listening to any of the audio CD interviews he  
7 must **not have read** much of, or any, of the 501-page IAB file as it was conclusively  
8 established by both [REDACTED] [REDACTED] and [REDACTED] [REDACTED] that [REDACTED] [REDACTED] [REDACTED] was  
9 **the individual sending those *anonymous text messages***. **Not** Deputy Mandoyan.

10 But in the Assistant Sheriff’s defense, it’s highly likely that he too fell prey to only  
11 reading the condensed seven (7) page IAB prefatory summary prepared by the Investigator  
12 assigned to this case; Sergeant [REDACTED] And as was noted supra, the investigation work  
13 product of Sergeant [REDACTED] was in his own confession from the witness chair: “*a shoddy, one*  
14 *sided, and incomplete Investigation.*” Now we know so too was the decision to terminate  
15 Deputy Sheriff Mandoyan based on not even scant evidence, but no evidence at all. Evidently,  
16 Deputy Mandoyan by asserting the truth that none of these fabrications claimed by [REDACTED]  
17 [REDACTED] ever occurred, in the opinion of both Sergeant [REDACTED] and Assistant Sheriff [REDACTED]  
18 [REDACTED] that *ipso facto* makes Deputy Mandoyan not credible and ends up with the  
19 unfathomable inclusion of further additional and baseless charges of *making false statements in*  
20 *an IAB Investigation*. A position that makes absolutely no sense as it would be no different  
21 than anyone in criminal court saying *Not Guilty* when entering a plea at Arraignment, then  
22 moments later being instantly charged with *False Statements*. Quite the ludicrous scenario  
23 being asserted here by the Respondent.

24 Which really calls into question not only the investigation undertaken by Sergeant  
25 [REDACTED] that was in his own adoptive admission from the witness chair: “*a shoddy, one sided,*  
26 *and incomplete Investigation.*”, but apparently the conclusion of Assistant Sheriff [REDACTED] was

1 of similar vintage. Leaving the only question remaining: What was the real reason for the  
2 termination of Deputy Mandoyan? It certainly cannot be for anything associated with Sergeant  
3 [REDACTED] *"a shoddy, one sided, and incomplete Investigation."* As that was exposed during  
4 this Hearing as a total abomination. Leaving by deduction the only remaining possibility that  
5 even though there is no policy violation in the letter of imposition [Department's Exhibit 3]  
6 like discharging a firearm while inebriated, having hair too long, or an impermissible beard  
7 while on duty in uniform, it can only be for having a station mascot as skin art. A somewhat  
8 plausible yet nonsensical theory based on the incessant questioning by the Respondent's  
9 Advocate on this trifling matter.

10 Since the Respondent could never properly discipline a Deputy Sheriff for having *skin*  
11 *art* that reflects a Departmental Station Mascot, the letters L.A.S.D., or the LASD Star itself,  
12 they utilized this fictitious DV case and anonymous texts messages as a subterfuge to terminate  
13 Deputy Mandoyan for literally having *Departmental skin art*. An offense that doesn't even  
14 exist in the Respondent's Manual of Policy and Procedures, and certainly wasn't a charge in  
15 this case as it never could be a viable charge. Consequently, the decision by Assistant Sheriff  
16 Denham cannot be upheld based on the result of IAB Sergeant Smeltzer's *"a shoddy, one*  
17 *sided, and incomplete Investigation."*, that was exposed as an utter sham and decimated at this  
18 Hearing.

19 Deputy Sheriff [REDACTED] [REDACTED]

20 Was a Deputy Sheriff assigned to West Hollywood Station at the same time [REDACTED]  
21 [REDACTED] worked there. He provided nothing in the way of testimony that would further assist the  
22 finder-of-fact in this case as everything he knew was told to him by [REDACTED] [REDACTED] Therefore,  
23 it's all self-serving hearsay. But he did add a very important component of information into  
24 this case that cannot go unnoticed; he too was a *lousy liar*. His first lie, but certainly far from  
25 his biggest, was when he said: "His wife (Sergeant [REDACTED] [REDACTED] and [REDACTED] knew each  
26

1 other and never had any issues.” Not so according to the testimony and facial expressions of  
2 [REDACTED] [REDACTED] when she heard the name; [REDACTED] [REDACTED] To say the least.

3 But Deputy [REDACTED] next preposterous lie would even make Geppetto cringe and cause  
4 Pinocchio’s nose to shrink when he had the *unmitigated gall* to say that: “[REDACTED] [REDACTED] had a  
5 highly regarded reputation by the West Hollywood Station Master FTO Saavay, and was a go  
6 to person for new trainees at West Hollywood Station.” Possibly only exceeded by his next  
7 equally astonishing lie when he said that: “He’s never seen or read the *anonymous text message*  
8 that was sent to his fiancé, now wife, Sergeant [REDACTED] [REDACTED] accusing him ([REDACTED] and  
9 another male deputy of having a three-way sexual tryst with [REDACTED] [REDACTED] Fortunately, the  
10 testimony of Deputy [REDACTED] concluded at that point before any further prevaricator statements  
11 were spoken while under oath to tell the truth.

12 The only constant throughout the course of these proceedings was the brazenness of the  
13 Respondent’s witnesses (other than Lieutenant [REDACTED] [REDACTED] and Sergeant [REDACTED] [REDACTED]  
14 to deceive, fabricate, and just outright lie. Apparently the oath taken at this Civil Service  
15 Hearing doesn’t have the same force and effect of one taken before a Judge wearing a Black  
16 Robe in the Superior or Federal Court. A sad reality but reflective of the individuals called to  
17 testify by the Advocate for the Respondent obviously not taking these proceedings seriously.  
18 Was it the result of all of the time spent by the Respondent’s Advocate *coaching* these  
19 witnesses? Or perhaps they do the exact same thing when they go to the other courthouses?

20 **Lieutenant Lowana Haselrig**

21 Was a witness called out of order by the Appellant for scheduling accommodation  
22 based on her Departmental duties. She is a twenty-nine (29) year veteran of the LASD  
23 working herself as an FTO at Carson Station and also as a Staff Drill Instructor (“DI”) at the  
24 Sheriff’s Training Academy from 1997-2000. She was a Lieutenant at West Hollywood from  
25 2007-2013 where she was a shift Watch Commander and supervised both Deputy Mandoyan  
26 and [REDACTED] [REDACTED] in that capacity. Lieutenant Haselrig said that Deputy [REDACTED] [REDACTED] was

1 "Salty" and not loyal to the LASD." As harsh as that comment was toward the character of  
2 Deputy [REDACTED] it paled in contrast to the Lieutenant's next statement when she was  
3 asked her opinion regarding [REDACTED] and she responded by saying: "*She's a Con Artist.*"  
4 The Hearing Officer inquired Sua Sponte asking her (Haselrig) what she meant by the phrase:  
5 "*She's a Con Artist.*", and she said: "Someone who would do anything to get what they  
6 want."

7 Lieutenant Haselrig, on re-direct in response to the charges related against Deputy  
8 Mandoyan under charge 3 (a), (b), (c) of the Letter of Imposition [Department's Exhibit 3,  
9 Pages-3, 4] that he: "...brought discredit upon yourself and/or the Department as evidence by,  
10 but not limited to; (a) being named as a Domestic Violence/Stalking suspect in an El Segundo  
11 Police Department Crime Report (# 15-1659) and/or, (b) having a domestic violence  
12 restraining order filed against you (North Valley District Chatsworth Courthouse under case #  
13 [REDACTED] and/or, (c) failing to notify your immediate supervisor and/or watch commander  
14 that you were served, and named in, a domestic violence restraining order. The order restricted  
15 your ability to possess firearms," Haselrig said: "The LASD was embarrassed by a false report  
16 and false TRO made by Deputy Sheriff [REDACTED] "*She's a Con Artist.*"

17 Moreover, given that Deputy Mandoyan was already relieved of duty ("ROD") by the  
18 Respondent back on July 10, 2015, and he wasn't served with the [REDACTED] TRO by  
19 [REDACTED] until July 22, 2015 [Department's Exhibit 17, Pages-40, 41] and  
20 promptly thereafter turned over all of his "personal" firearms in the field to the El Segundo  
21 Police Officers at the scene, (Appellant's Exhibit 51) then immediately called his union  
22 attorney to advise her of that event, who in turn contacted the Respondent, none of these  
23 charges have any vitality.

24 When asked whether or not a Deputy Sheriff is responsible for all county property  
25 issued to them when they're hired, specifically their Flat Badge Identification Credentials and  
26 Duty Firearm, Lieutenant Haselrig said: "Yes they are." When she was presented with the

1 situation that Deputy Mandoyan faced when [REDACTED] [REDACTED] locked him out of her apartment  
2 while he (Mandoyan) still had inside her residence a backpack containing his County Flat  
3 Badge, Duty Firearm, and car keys, how she (Haselrig) would handle that situation she said  
4 quite candidly: "Those are affairs of the heart", and when she was a Deputy Sheriff she would  
5 have exhausted all efforts to recover those county items herself including banging loudly on  
6 the door and making noise prior to involving law enforcement and/or her own Department.  
7 Today as a Lieutenant if a similar situation was presented to her she might respond differently.  
8 However, it's still "an affair of the Heart."

9 She also spoke extremely highly of Deputy Mandoyan saying he was an excellent FTO,  
10 always spending time helping other Deputy Sheriff's learning how to do their jobs better, and  
11 was a person who had extraordinary Integrity. When asked on cross-examination by the  
12 Respondent if her impression of the Appellant would change if she knew Deputy Mandoyan  
13 was terminated for policy allegations such as DV, stalking, etc.? Haselrig said: "No, because I  
14 know it's not him and definitely not his character. I wouldn't believe those allegations."

15 Deputy Sheriff [REDACTED] [REDACTED]

16 Was another witness called out of order by the Appellant and after the direct testimony  
17 of [REDACTED] [REDACTED] concluded with insufficient time remaining that afternoon for her cross-  
18 examination. [REDACTED] [REDACTED] has been a Deputy Sheriff since 2005 and worked patrol at the  
19 Lennox/South LA Station when Deputy Mandoyan had transferred to that facility and they  
20 became friends. He testified that Deputy Mandoyan had called him up on an occasion in 2013  
21 and asked him if he wanted to go to Universal City Walk to a restaurant called *Saddle Ranch*.  
22 [REDACTED] agreed and since he lived in the Hollywood area and Universal City Walk was also  
23 located in Hollywood, Deputy Mandoyan said he would pick him up as he was driving there  
24 from El Segundo and it didn't make sense for both of them to drive their cars. After they were  
25 at Saddle Ranch for several hours, Deputy Mandoyan received either a phone call or text from  
26 his girlfriend ([REDACTED] [REDACTED]) who was a Deputy Sheriff that worked at Universal City Walk.

1 [REDACTED] said she saw his (Mandoyan) vehicle in the Universal City Walk parking lot while she  
2 was doing patrol checks and wanted to know what he was doing there. [Department's Exhibit  
3 19, Page-9, Photograph of Mandoyan's Red Lexus] Mandoyan said he was at Saddle Ranch  
4 having dinner and a few drinks with a Lennox/South LA Station Deputy. [REDACTED] [REDACTED] met  
5 up with both Deputies Mandoyan and [REDACTED] later that night in the parking lot where he  
6 introduced the two of them and they all talked together for about 45 minutes and even had a  
7 cigarette.

8 Not surprisingly, no mention was made by [REDACTED] [REDACTED] when he was at Universal  
9 City Walk with Deputy Mandoyan for dinner and drinks of any purportedly *Fast and Furious*  
10 auto maneuvering on the freeway chasing down [REDACTED] [REDACTED] prior to Deputy Mandoyan  
11 dropping him off back at his residence in Hollywood.

12 It was likely this was the occasion that [REDACTED] [REDACTED] had taken the photograph of  
13 Deputy Mandoyan's Lexus for some unknown and bizarre reason. (Much like her Felony  
14 crime recording a phone conversation without his knowledge or consent also in 2013) But it  
15 became quite apparent when she used this photograph as a *prop* in her initial July 14, 2015  
16 fabricated police report with the ESPD years later when she falsely claimed: "In January of  
17 2015 (unknown date), Mandoyan arrived at her work in Universal City. She left work early as  
18 soon as she realized he was there waiting for her." [Department's Exhibit 6, Page-4] Not  
19 surprisingly, [REDACTED] [REDACTED] told another variant of this concocted lie about a week later on July  
20 20, 2015 in her subsequent interview with Detectives Danowitz and Humphrey of the ESPD  
21 when she said: "He followed me home from work. So he actually went to work. And he was  
22 drinking up at Universal. And I had just left work early at 3:30. I was supposed to get off at  
23 4:00. I left at 3:30 just so I didn't have to deal with him like on the freeway. And when he  
24 realized I left, he just raced off obviously. Because I was only able to get..." [Department's  
25 Exhibit 5, Pages-15, 16]

1 Then [REDACTED] [REDACTED] offered yet another *third version* of this fictional account when she  
2 was interviewed on June 24, 2016 by IAB Sergeant [REDACTED] [REDACTED] when she stated: "Well he  
3 showed up at my work wanting to talk." At West Hollywood, right? "Yeah, at Universal."  
4 Okay. "And he was there with friends drinking. I've never seen him there with anybody. So  
5 I left work without saying anything to anybody. I kind of just left right before the end of my  
6 shift. And so because I didn't want him following me home because he had followed me home  
7 before." [Department's Exhibit 7, Pages-44, 45] Quite the novel statement since [REDACTED]  
8 [REDACTED] herself testified that Deputy Mandoyan stayed at her residence *3 or 4 nights a week*  
9 while they were dating.

10 As with any *liar*, they just cannot reconcile all of these make-believe events, who they  
11 told them to, and what version of the *lie* was utilized on each of those occasions. When asked  
12 in her IAB interview about when she took the photograph of Mandoyan's Red Lexus she said:  
13 "I took that picture, it was in the winter time, I wanna, it was like either...It might have been  
14 in November, November, early December 2014." Right before the relationship ceased, right?  
15 "Right before, yeah. And he was parked at Universal." Okay. Could you do me a favor and  
16 just, and what was the reason that you took a picture of the car at this time? "Because I, his car  
17 was there and I called him and he, to say, hi, what are you doing, where are you, and he told  
18 me that he was in the bathroom at home, didn't feel well. And so I said, that's interesting  
19 because I see your car. It's parked here at Universal." [Department's Exhibit 7, Pages-41]

20 But the first three (3) written accounts paled in comparison to the farcical fourth (4<sup>th</sup>)  
21 rendition she told from the witness chair at the Hearing about how Deputy Mandoyan was  
22 aggressively cutting her off on the freeway, then getting in front of her car and jamming on his  
23 brakes causing her to have to swerve and jam on her own brakes to avoid having a collision.  
24 Making it even more harrowing that she was doing these high speed evasive maneuvers while  
25 simultaneously talking on the phone with Deputy Mandoyan for twenty-six (26) minutes in real  
26 time. (Appellant's Exhibit 58) That probably explains why she wasn't able to call 911 to

1 report this fictitious vehicular assault that was occurring on the freeway while she was  
2 desperately trying to get home to avoid any encounters with Deputy Mandoyan. As she was  
3 simply too busy talking with him on her cell phone.

4 Or perhaps the untrammelled truth was because the entire scenario was a hand-quilted  
5 balderdash *lie* since that very same evening [REDACTED] [REDACTED] texted Deputy Mandoyan and made  
6 arrangements for him to get into a crowded restaurant/club as evidenced in her text message to  
7 him: "Hes on his way up to get u in." They got me in...I'm good..Thank u." (Appellant's  
8 Exhibit 57) Completely eviscerating all three (3) of those cockamamie stories told by her  
9 about that *frightful evening at Universal City Walk*, and categorically negating the *fourth*  
10 adaptation of [REDACTED] [REDACTED] fib, voiced in real time from the witness chair about this fantasy  
11 event that never happened. Proving once again that an *oath to swear or affirm to tell the truth*  
12 *was mocked in these proceedings*, over and over again by the Respondent's primary witness;  
13 [REDACTED] [REDACTED]

14 It was curious though when the Advocate for the Respondent asked Deputy [REDACTED] if he  
15 had a *Reaper Tatoo*? He said: "No." Then he was asked if he was a *Reaper*? He replied:  
16 "No." Then he was asked if he knew what a *Reaper* was? He stated: "Yes, you mean the  
17 character?" The Respondent's Advocate then said; no the station thing? "He replied: "Well  
18 yes. Just like every other Station in the Department, Lennox/South LA station has a mascot.  
19 The *Reaper* mascot is commonly used on hats, t-shirts, and other attire or paraphernalia that  
20 identifies the Station just like every other Station. It's more of a camaraderie and Station pride  
21 thing, just like fraternities and military units such as the Marines." He indicated that he  
22 himself had a tattoo in recognition of his service in the United States Marines.  
23 She also asked him if he knew Deputy Mandoyan had a *Reaper* tattoo? He said: "No." She  
24 asked him if he ever saw Deputy Mandoyan's tattoo? He said: "No." She asked him if Deputy  
25 Mandoyan ever told him he had a tattoo? He again said: "No." Then she asked him a second  
26

time if he (Christian [REDACTED] was a *Reaper*? He said: "No." When he was asked why he wasn't asked to be one he said: "I just wasn't."

Once again, laying the foundation for the real motive behind the termination of Deputy Mandoyan as there was nothing even remotely viable about any of the charges lodged in the Respondent's Letter of Imposition to support this insulting line of questioning. Other than exposing the true motivations of the Respondent in engineering this unsupportable termination that is obviously a smear tactic since there is nothing even tangentially related to their letter of imposition. [Department's Exhibit 3]

**Deputy Sheriff [REDACTED]**

Was another Deputy Sheriff who also worked at the West Hollywood Sheriff's Station with [REDACTED] Deputy [REDACTED] did not work with Deputy Mandoyan who was no longer at WHD as he had already transferred to Lennox/South LA Station. They had connected with each other on Facebook and *friended* each other. In [REDACTED] interview with IAB Sergeant [REDACTED] on June 29, 2016 she said when asked: All right. Did he (Mandoyan) ever specifically ask who she [REDACTED] was dating after they broke up? "He, no, never asked me that question." Which made it very puzzling when she also stated in her IAB Interview: At any point did, you feel that Deputy Mandoyan ever tried to manipulate you? "Absolutely."

[Department's Exhibit 8, Pages-5, 8] Hard to reconcile those diametrically opposing statements. However, when the question about Deputy Mandoyan manipulating Deputy [REDACTED] was asked by the Advocate for the Respondent, it was struck Sua Sponte by the Hearing Officer as being argumentative and speculative.

Deputy [REDACTED] initially denied on cross-examination that Deputy Mandoyan was assisting her in writing reports that she was detailed as a patrol Deputy at West Hollywood Station, but when confronted with **Appellant's Exhibit 53** that consisted of twenty-two (22) pages of emails between her and Deputy Mandoyan with him writing up both crime reports, declarations of probable cause, and arrest report narratives for her, she instantly became very

1 defensive and said he was only "*proof reading her reports.*" The four corners of all of the  
2 emails contained in that exhibit emphatically show otherwise. So much for who was being  
3 *manipulated.*

4 The most germane testimony from Deputy [REDACTED] though was when it was  
5 conclusively established that [REDACTED] [REDACTED] was the culprit behind all of this  
6 *anonymous text messaging* as Deputy Sheriff [REDACTED] [REDACTED] said in her interview with IAB  
7 Sergeant [REDACTED] on **June 29, 2016**: "And then later we found out who that person was who  
8 was sending those messages." Who was that? It's [REDACTED] [REDACTED] best friend that used to,  
9 well, not used to, but at the time was dating Carl Mandoyan." And who was that? "[REDACTED]  
10 [REDACTED] [Department's Exhibit 8, Page-7] This was after [REDACTED] [REDACTED] at first thought it  
11 was Deputy [REDACTED] sending her those text messages when she lashed at out at [REDACTED] by  
12 saying: "*You big tomato nose stay out of my business.*"

13 **Deputy Sheriff [REDACTED] [REDACTED]**

14 Was called as a witness by the Appellant, Deputy Mandoyan, since he too worked at  
15 West Hollywood Station when both [REDACTED] [REDACTED] and Deputy Mandoyan were also assigned  
16 there as patrol Deputies. Deputy [REDACTED] testified: "He was familiar with Deputy Mandoyan  
17 and he was the go to guy for any narcotic arrests at West Hollywood Station. He was an FTO  
18 and a real sharp guy." Testimony also remarkably consistent with his statement made to IAB  
19 Sergeant [REDACTED] on June 30, 2016 [**Department's Exhibit 10, Page-2**] He was also asked to  
20 *shed some light* on this "taking my patrol car keys" event alleged by [REDACTED] [REDACTED] that  
21 occurred in West Hollywood on an unknown date and unknown time. She told it on three  
22 different occasions with three different versions being offered. Unbeknownst to Deputy  
23 [REDACTED] he was mentioned quite *prominently* in [REDACTED] [REDACTED] final and third adaptation of  
24 this *Hocus-Pocus whopper of a lie*. For the sake of brevity here are the three alternatives to  
25 choose from according to the *Smorgasbord of lies* from the mouth of [REDACTED] [REDACTED]



1 Interview he consistently stated: "No." "No, I don't remember that ever happening."

2 [Department's Exhibit 10, Pages-4, 5] Apparently Assistant Sheriff [REDACTED] missed that  
3 cogent statement from Deputy [REDACTED] too as he read through the 501-page IAB  
4 Investigation. Or simply ignored it when he based his decision to terminate Deputy  
5 Mandoyan: "On the words of [REDACTED] [REDACTED]"

6 Deputy [REDACTED] also said: "Deputy Mandoyan was the type of FTO who always went  
7 out of his way to help new Deputies learn how to do their jobs better, and when he got off his  
8 shift he would remain in the station for hours on his own time talking with Supervisors and  
9 helping out in dispatch because the Department was his life."

10 **Homicide Lieutenant [REDACTED] [REDACTED]**

11 Was a witness called by the Appellant. Curiously, he was purposely omitted from the  
12 Respondent's rather voluminous binder even though he was interviewed by IAB Sergeant  
13 [REDACTED] [REDACTED] on June 22, 2016. Which was very strange given that Lieutenant [REDACTED] was  
14 another cornerstone of this entire case as he was promptly notified immediately by Deputy  
15 Mandoyan of a *very disturbing and profanity laced nasty phone* call he (Mandoyan) received  
16 while On Duty at Lennox/South LA Station from Deputy [REDACTED] [REDACTED] on June 3, 2015 at  
17 1719 hours (5:19 p.m.) threatening his career with false allegations of invented crimes.  
18 Lieutenant Moore was the PM Watch Commander at the Station and "Ordered" Deputy  
19 Mandoyan to write a Memorandum detailing the content of this *repugnant phone call*.

20 **(Appellant's Exhibit 61)**

21 The content of the one minute and fifty-six (56) second phone call made by [REDACTED]  
22 [REDACTED] to Deputy Mandoyan is scandalous! Casting aside the vulgarities, the threatening tirade  
23 alone ought to have been sufficient to have *her terminated for such repugnant conduct* that  
24 absolutely shocks the conscience. For the Respondent to have done absolutely nothing about  
25 the conduct of [REDACTED] [REDACTED] and her actions speaks volumes and exposes their inability to  
26 conduct any semblance of an *actual, neutral, or Independent* IAB Investigation. [REDACTED]

1 Taylor's *obnoxious rant* was set forth as follows: "You can say goodbye to your fucking job  
2 you fucking idiot. You're a fucking idiot. When I'm done with you, you're going to need a  
3 psych approval to get your job back. You're a stupid Mother Fucker....Fuck you, you  
4 fucked up. I'm going to call your Watch Commander and tell him that you broke in my  
5 place and anything else that I want...Fuck you, you're a basehead."

6 After Lieutenant [REDACTED] was called as a witness and being asked questions regarding his  
7 interactions with Deputy Mandoyan, the Respondent engaged in an opaque feigning *Mea*  
8 *Culpa* oversight claiming that his interview transcript was inadvertently omitted from their  
9 book of exhibits. Although the Appellant handed them copies of Lieutenant [REDACTED] entire  
10 seven (7) page interview as a courtesy for inclusion as newly added [Department's Exhibit  
11 32] for convenience. Lieutenant [REDACTED] testified: "That Deputy Mandoyan was his best FTO  
12 and that he (Lieutenant [REDACTED]) just felt better knowing that Deputy Mandoyan was working on  
13 his shift and that if something needed to be taken care of it would be done correctly by him.  
14 He had the utmost of confidence in him and his integrity was never in question and he never  
15 had any issues about Deputy Mandoyan's integrity. He was diligent and knowledgeable  
16 training officer."

17 Once the Respondent began their cross-examination of Lieutenant [REDACTED] it became  
18 self-evident that their entire case which was exposed as nothing more than a *House of Cards* up  
19 to that point had not only failed miserably, but now they were resorting to backdoor loathsome  
20 tactics to improperly *tar and stain, then falsely portray* Deputy Mandoyan as some *rogue*  
21 *Deputy* because he had etched onto his body skin art of a Departmental Station Mascot to  
22 display pride in his accomplishment of becoming an FTO at Lennox/South LA Station. A  
23 level of success that very few Deputy Sheriff's over the decades have ever achieved during  
24 their careers, and a commonly recognized practice by those highly experienced FTO's who  
25 have put in the hard work and time to make their communities and its residents safer by a  
26

1 sacrifice of the time needed to make those neighborhood streets secure for everyone who live  
2 there.

3 Sadly, the Respondent immediately took to the *Low Road* to now vilify Deputy  
4 Mandoyan in a clear quest to tarnish his reputation and image before the Hearing Officer by  
5 asking Lieutenant [REDACTED] assigned to Homicide Bureau: "If he was aware that the  
6 Appellant had a "Reaper" tattoo? At which point the Hearing Officer himself Sua Sponte  
7 inquired of Lieutenant [REDACTED] "What would be his impression of someone who had a "Reaper"  
8 tattoo?" To which Lieutenant [REDACTED] replied: "It would mean that individual worked a long time  
9 at Lennox/South LA Station and that they were a *hard worker*." That completely exposed their  
10 odious conduct of casting false aspersions on Deputy Mandoyan as their deplorable IAB case  
11 was exposed as a scurrilous effort to terminate a Deputy Sheriff who had done absolutely  
12 nothing wrong other than the misfortune to have become involved with female members of the  
13 Department who were emotionally crippled and unstable. Not even constituting a policy  
14 violation as there is absolutely nothing in the Respondent's Manual of Policy and Procedures that  
15 addresses dating relationship choices. Nor were there any charges in the Respondent's Letter of  
16 Imposition. [Department's Exhibit 3]

17  
18  
19 **Deputy Sheriff [REDACTED]**

20  
21 Or more accurately, Former Deputy Sheriff [REDACTED] Apparently between the  
22 date of her direct examination on July 26, 2017, and the two months in between and right  
23 before her cross-examination was commenced on September 27, 2017 Deputy [REDACTED]  
24 **"Resigned for Personal Reasons."** No doubt to spare herself the humiliation of being  
25 terminated by the Respondent for a plethora of patently dishonest statements made in both her  
26 IAB Interviews, ESPD Detective Interview, false initial ESPD Report, sham POE Complaint,

1 and her fraudulent TRO Application submitted under Penalty of Perjury in the Superior Court.  
2 Not to mention her Felony crime in illegally recording a phone conversation with Deputy  
3 Mandoyan back in 2013 in order to obtain future *leverage* so she could end their relationship  
4 when she became bored with him by manufacturing yet another baseless made-up claim  
5 against him. Consistent with her direct testimony on July 26, 2017 that she: "Felt trapped in  
6 the relationship back in 2013." Based on the state of the evidence in this case up to that point it  
7 doesn't require much insight to figure out that she was caught in a web of lies that couldn't be  
8 sorted through or buried by Sergeant [REDACTED] as it was a maze beyond comprehension. It  
9 would be easier to complete a *Rubik's Cube* than unraveling and cataloging the intricacies and  
10 catacombs of all of her lies in this entire odyssey, but the Appellant will try his best to  
11 concisely sort through this quagmire for the Hearing Officer. Here they are in no specific  
12 order:

- 13 1. [REDACTED] [REDACTED] along with [REDACTED] [REDACTED] [REDACTED] both former dating partners  
14 of Deputy Mandoyan, went to the Chatsworth Courthouse on July 14, 2015 with  
15 Deputy [REDACTED] [REDACTED] filing for a meritless TRO alleging stalking and Domestic  
16 Abuse/Violence (DV);
- 17 2. After receiving her TRO [REDACTED] [REDACTED] told her Supervisor and at some point she  
18 was contacted by another Supervisor from Internal Criminal Investigations Bureau  
19 ("ICIB") and ordered to file a police report. She never did identify who actually  
20 told her to make that false report alleging Domestic Violence (DV). (Nor were they  
21 brought to the Hearing to testify by the Respondent) She did call the El Segundo  
22 Police Department that very same night at 2014 hours (8:14 p.m.). Don't people  
23 call the police department first? Then get advice from law enforcement about filing  
24 for a restraining order? Both of which presumes there isn't any legitimate or viable  
25 establishment of Domestic Violence in this case. The first of many Red Flags;

- 1 3. Both of these two forgoing events (TRO, and Police Report) were done nearly *three*  
2 *(3) weeks after* [REDACTED] [REDACTED] made her initial Policy of Equality (POE) with  
3 Lieutenant Wiard on June 23, 2015 (**Appellant's Exhibit 60: Pages-1, 2**) that  
4 stated *Absolutely Nothing about any Domestic Abuse/Violence (DV)*. Another **Red**  
5 **Flag**;
- 6 4. Putting aside the absolutely false and fraudulent Domestic Abuse allegation that  
7 purportedly occurred eleven (11) months earlier, that everyone knew never in-fact-  
8 happened, [REDACTED] [REDACTED] became bolder and bolder with her propagating lies and  
9 ever changing chameleon stories. In particular, the **grandiose tale about**  
10 **Mandoyan taking the ignition key from her radio car while she was On Duty at**  
11 **West Hollywood Station** ("WHD") as first reported to ESPD Officer Marco Lemus  
12 on July 14, 2015: "On one occasion, while they were both on duty, he took her unit  
13 keys and left. The victim was stranded and unable to respond to a potential call."  
14 **[Department's Exhibit 6, Page-3];**
- 15 5. Then Deputy [REDACTED] [REDACTED] further embellished that fake story in her next  
16 interview with Detectives Danowitz and Humphrey from the ESPD on July 20,  
17 2015 when she said: "...And he did. He came out there, and he friggin' wiggled out  
18 because I wouldn't give him my cell phone. And so he...There's nothing on it.  
19 Like, Dude, what is your problem? So he took the keys out of my radio car...I was  
20 left with my radio car in a parking lot with no keys...I want to say like maybe like  
21 15, 20 minutes... Well, I typed one of my partners and said: "Hey, do you have an  
22 extra key? An extra set of keys?" **[Department's Exhibit 5, Pages-4, 5];**
- 23 6. When IAB Sergeant [REDACTED] was interviewing Deputy Sheriff [REDACTED] [REDACTED]  
24 himself for her first IAB interview, which was now the *third iteration* of this:  
25 "Taking the keys from the ignition of my radio car story," she mentions for the *very*  
26 *first time* that she had typed: "[REDACTED] for the extra set of keys. And you said by

1 the time he had replied to you..."Yeah, I already had my stuff back, so."

2 [Department's Exhibit 7, Pages-9 through 13] Shockingly, even while in  
3 possession of three (3) alternating versions of this manifestly false event, Sergeant  
4 S [REDACTED] never bothered to obtain any of the MDT Logs between Deputy Sheriff  
5 [REDACTED] [REDACTED] and Deputy Sheriff [REDACTED] [REDACTED] to corroborate or *refute* this  
6 absurd occurrence.;

7 7. Even Sergeant [REDACTED] obviously didn't believe the underpinnings of this *fish tale*  
8 otherwise he would have asked [REDACTED] [REDACTED] whether or not Caren Mandoyan was  
9 "ON DUTY" or "OFF DUTY" in any of these three sham stories that were being  
10 told to "four" different individuals on three occasions: ESPD Officer Marco  
11 Lemus; ESPD Detectives Danowitz and Humphrey; and now IAB Sergeant  
12 [REDACTED] A simple question such as: "Was Deputy Mandoyan in uniform and  
13 driving a Sheriff's Department Patrol vehicle? It was never asked. Another Red  
14 Flag.;

15 8. [REDACTED] Taylor's first report to the El Segundo Police Department on July 14, 2015  
16 [Department's Exhibit 6, Page-3] where she says: "Mandoyan became controlling  
17 over the victim. He did not want her talking to her cousins, her co-workers and did  
18 not want her to attend briefings at the beginning of her shifts.";

19 9. [REDACTED] [REDACTED] next reported this same lie with Detectives Danowitz and Humphrey  
20 from the ESPD on July 20, 2015 when she said: "No, he wouldn't want, he didn't  
21 want me to go to briefing. He didn't want me going to...I don't know. He just  
22 didn't want me going to briefing. He didn't want me talking to anybody. He didn't  
23 want me going to like, if I was the assist on calls, like, he didn't want me going to  
24 those calls [Department's Exhibit 5, Page 2];

25 10. [REDACTED] [REDACTED] never told anyone at the ESPD or Sergeant [REDACTED] the simple truth  
26 that Mandoyan never in fact told her any of that. As evidenced by (Appellant's

Exhibit 55) a text message string with [REDACTED] typing: "Am I not allowed to have a conversation with my cousin." Mandoyan typing: "Yes of course you are." Then [REDACTED] typing: "Ur fuckng ridiculous." And Mandoyan typing: "Thanks for the kind words."

11. It was extremely odd that [REDACTED] didn't provide this information or the text message string to the ESPD given that she said in her July 20, 2015 interview with Detective Danowitz and Humphrey: "I just, I mean for the record, you know, I'm glad El Segundo is handling this criminal report, because I don't trust my agency for shit." [Department's Exhibit 5, Page-12] Hard to reconcile why [REDACTED] would have to be ordered to make a report by her own agency in the first place. Did anyone actually tell her to make a false police report? She never did provide a name. Sergeant [REDACTED] never asked her for a specific name to contact that individual. Obviously because nobody wants to initiate an utterly false report on their own. Another Red Flag;
12. Falsely claiming that their relationship ended in December, 2014 in both her POE Complaint (Appellant's Exhibit 54), Initial report to the ESPD on July 14, 2015 [Department's Exhibit 6, Page-3], ESPD Detective Interview July 20, 2015 [Department's Exhibit 5, Page-3], and her IAB Interview on June 24, 2016 that their relationship had ended in December, 2014 [Department's Exhibit 7, Page-41], and falsely testified at the Hearing that their relationship ended just before Christmas, 2014;
13. Impeached with (Appellant's Exhibit 56) text messages clearly showing on December 27, 2014; and December 28, 2014 that Deputy Mandoyan was not only still texting [REDACTED] report narratives and Probable Cause Declarations, but [REDACTED] was still texting him Back: "I Love You." Clearly establishing they

were in a relationship during the time frame she lied about and said that they were not still in a dating relationship.

14. Impeached again with (Appellant's Exhibit 60) the missing pages from her TRO Application that set forth the dates of these various fictitious events as 01/26-2015; 12/27/2014; and 09/01/2014. After she testified on both direct and cross-examination that these dates of incidents were just approximations and she never said or wrote these exact dates.

15. Further Impeached with her Initial report to the ESPD on July 14, 2015 [Department's Exhibit 6, Page-3], ESPD Detective Interview July 20, 2015 [Department's Exhibit 5, Pages-6, 14, and 20], and in her IAB Interview on June 24, 2016 that these were the same dates she had used repeatedly in telling these false stories: 01/26-2015; 12/27/2014; and 09/01/2014. [Department's Exhibit 7, Pages- 27, 41, 44],

16. Impeached with (Appellant's Exhibit 59) the PM In-Service Sheet from WHD dated June 3, 2015 that listed Deputy [REDACTED] working Universal City Walk from 1700 (5:00 p.m.) to 0300 (3:00 a.m.) after she testified that she never called Deputy Mandoyan that day while she was working her shift. That was the day of the threatening phone call she made while ON DUTY at 1719 Hours (5:19 p.m.) as follows: "You can say goodbye to your fucking job you fucking idiot. You're a fucking idiot. When I'm done with you, you're going to need a psych approval to get you job back. You're a stupid Mother Fucker....Fuck you, you fucked up. I'm going to call your Watch Commander and tell him that you broke in my place and anything else that I want...Fuck you, you're a basehead." (Appellant's Exhibit 61) The Memorandum Deputy Mandoyan wrote to Lieutenant [REDACTED] his PM Watch Commander at South LA Station;

- 1 17. Impeached herself at trial when she stated in response to the inquiry from the  
2 Hearing Officer as to how much of Deputy Mandoyan's body entered her back  
3 bathroom window and she said: "Maybe his arm." Which was in *sharp conflict*  
4 with her prior numerous statements of this utterly sham story ranging from:  
5 "Climbed halfway inside" Her Initial report to the ESPD on July 14, 2015;  
6 [Department's Exhibit 6, Page-3]; "Half in the window." ESPD Detective  
7 Interview July 20, 2015 [Department's Exhibit 5, Page-16], and "Got his upper  
8 body through." [Department's Exhibit 7, Page-45],
- 9 18. One need to look no further than the tiny size of the rear bathroom window depicted  
10 in (Appellant's Exhibit 53), in comparison to the size of Deputy Mandoyan to  
11 recognize the impossibility of those meritless allegations.
- 12 19. One only needs to read the following excerpts from the July 14, 2016 IAB  
13 Interview of Deputy Mandoyan to illustrate the sheer lack of vitality to these  
14 charges related to gaining entry into [REDACTED] Residence in December, 2014  
15 when he said: "No. I was knocking, trying to make some noise. She locked me out  
16 that day. We were inside. We had gotten into a little verbal argument and she  
17 locked me out with my backpack and keys inside. So I was trying to get her  
18 attention to come and let me in. And I had a broomstick and I started tapping, not  
19 even the sliding glass door side, the side that's solid on the side, and I was tapping  
20 to get her attention, like, [REDACTED] come let me in. And she'd come over and it's  
21 like, no, no, go away. I said let me in so I can get my backpack and my keys and  
22 we're talking back and forth...No when [REDACTED] came to the door, she was, you  
23 know we were talking and I'm like, can you let me in so I can get my backpack and  
24 my keys so I can leave and she was like, no, no, it was silly. Then she, as soon as  
25 we both stopped filming each other, she came back and let me in and that was the  
26 end of it. I was never trying to break into her place." [Department's Exhibit 17,

1 **Pages-21, 22]**. Also the pretend DV allegation that never took place on September  
2 1, 2014 based on the further Interview statement from Deputy Mandoyan: "The  
3 restraining order that I was served with had the allegations and she had a September  
4 1 date and I don't know how she, how this September 1 date came about. The only  
5 that could have ever, anything about September was September 3, I had back-  
6 related surgery and I was out of commission for a few weeks and it was [REDACTED] you  
7 know, that took care of me. So I don't know any, I can't think pinpoint September  
8 1 because nothing occurred." **Department's Exhibit 17, Page-20]**

9 20. The further meritless allegation regarding the rear bathroom window episode was  
10 refuted and exposed with not only [REDACTED] testimony that was in sharp  
11 contrast to her previous multiple false statements about this occurrence to the  
12 ESPD, and IAB, but was absolutely eviscerated as another bewildering lie when she  
13 was confronted with phone records (**Appellant's Exhibit 58**) that severely  
14 Impeached her make believe story that strained to the point of no return her total  
15 lack of credibility.

16 Finally, after the Respondent's Advocate asked [REDACTED] if any of her claims were  
17 *False Allegations?* She replied: "No." After opening that door [REDACTED] was then asked  
18 on re-cross-examination: Do you know Detective Jennings from the Long Beach Police  
19 Department? She replied: "Yes." Then she was asked if she knows Deputy Bracks and  
20 Deputy Bankston? She replied: "Yes." Then she was asked if she made a police report when  
21 she heard that Deputies Bracks and Bankston were bragging about having group sex with her,  
22 she replied: "Yes." Establishing her compunction for making false police reports.

23 **Deputy Sheriff Caren Mandoyan**

24 Being falsely accused of ludicrous allegations that were never proven elected not to  
25 waste any further time of the Hearing Officer as these charges were false from front to back.  
26 They were all vengeful fabrications from their inception made by [REDACTED] who ended her

1 employment with the Respondent after it became quite apparent that her antics were so  
2 egregious that her career was finished in law enforcement and she resigned two days before her  
3 cross-examination was scheduled to begin. Unfortunately, given that the Respondent was  
4 obviously *duped* by [REDACTED] [REDACTED] from the inception of this *dating drama mishmash*, they  
5 have decided to let it run its course based on the vast resources they expended in believing an  
6 obvious *fish tale* from [REDACTED] [REDACTED]. One can only shudder at the amount of taxpayer money  
7 they expended on an expert witness who wasn't allowed to testify in these proceedings based  
8 on the clear prohibition as forth in California Evidence Code Section 1107. It's  
9 incomprehensible that the Respondent refused to recognize the failings in this entire fiasco and  
10 do the right thing by dismissing it and reinstating the Appellant forthwith with full back pay  
11 and benefits.

12 That being said, all that they're left with in this case is a contrived video crafted by a  
13 "Con Artist" trying to falsely portray Deputy Mandoyan attempting to gain access inside  
14 [REDACTED] Taylor's residence after she locked him out with his backpack and keys still inside.  
15 How was he going to get to work? He wasn't going to leave his backpack containing his  
16 county and personal property at the residence of [REDACTED] [REDACTED] who just locked him out. He  
17 did what anyone would do; Make some Noise!

18 Deputy Mandoyan told Sergeant [REDACTED] in his IAB Interview on July 14, 2016: "No.  
19 I was knocking, trying to make some noise. She locked me out that day. We were inside. We  
20 had gotten into a little verbal argument and she locked me out with my backpack and keys  
21 inside. So I was trying to get her attention to come and let me in. And I had a broomstick and  
22 I started tapping, not even the sliding glass door side, the side that's solid on the side, and I was  
23 tapping to get her attention, like, [REDACTED] come let me in. And she'd come over and it's like,  
24 no, no, go away. I said let me in so I can get my backpack and my keys and we're talking back  
25 and forth...No when [REDACTED] came to the door, she was, you know we were talking and I'm  
26 like, can you let me in so I can get my backpack and my keys so I can leave and she was like,

no, no, it was silly. Then she, as soon as we both stopped filming each other, she came back and let me in and that was the end of it. I was never trying to break into her place.”

[Department’s Exhibit 17, Pages-21, 22].

Given that this case was never about the truth as it’s incomprehensible how something so simple could be repeatedly botched by the world’s largest Sheriff’s Department, it must be about something else. Those ulterior motives were exposed throughout this case by the Advocate for the Respondent with the *never-ending tattoo questions*. Which is why they will be fulminating over their lamest charges in their Letter of Imposition under sections 2 (a-h); and 4 (a-d) [Department’s Exhibit 3, Pages-2, 3, 4]

For the sake of brevity, the Hearing Officer need to only read the following passages from the IAB Interview of Deputy Mandoyan to eliminate those libelous charges: “No, it was just me trying to get her attention to let me in...My keys and backpack. My belongings were inside the apartment...I was trying to get her attention by making, you know, so she could open the door and let me in...It was a grip from the weight thing that I think, I didn’t remember using it, but I was trying to use that to kind of knock on the solid portion of it to make some noise she could let me in.” [Department’s Exhibit 17, Pages-74, 75].

Then the easily offered truth of the January 26, 2015 twenty-six (26) minute *incoming* telephone conversation received from [REDACTED] [REDACTED] “I was trying to apologize to her because we had gotten into an argument earlier on the phone...I didn’t follow her. We were headed to her... We were going to her place...That’s when I slid open the sliding glass door. She had a couple shampoos and I can hear them drop in, they dropped in the tub and she thought I was getting, I never got into her apartment. I was talking to her from there. I was just trying to apologize to her...The sliding glass window.” [Department’s Exhibit 17, Pages-79, 80, 81] At the end of that particular video you can hear [REDACTED] [REDACTED] saying: “Fucking Asshole.”

That dispenses with this unsupportable notion of trying to break into her residence on either occasion.

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**APPELLANT'S CONCLUSION**


The complaining witness in this matter; Deputy Sheriff [REDACTED] [REDACTED] has embarked on a personal vendetta and meritless pattern of unsavory conduct culminated by contriving false accusations of domestic abuse against the Appellant Caren Mandoyan for refusing to engage in a long term personal relationship with her. Once her fantasy allegations were reported to law enforcement more than ten (10) months after never occurring and being thoroughly investigated; no case was ever filed by any prosecuting District Attorney's Office given that their independent and autonomous conclusions are that Deputy Sheriff [REDACTED] [REDACTED] lacks credibility. Deputy District Attorney Linda Loftfield SBN 127507, and Deputy District Attorney Jamie Garrison SBN 157070, with a combined fifty-two (52) years of prosecutorial experience saw this case for what it truly was; *a fraud*. Deputy Sheriff [REDACTED] [REDACTED] manufactured a story replete with distortions and fibs in order to impact Appellant's ten (10) years of employment as a Peace Officer for the LASD working as a Field Training Officer at South Station. All because she became bored with their relationship until she was told that Deputy Mandoyan was dating another Deputy Sheriff that [REDACTED] [REDACTED] used to be friends with years ago.

Her centerpiece saga was a fabricated non-existent episode of domestic abuse that had her giggling incessantly to the Detectives at the El Segundo Police Department while conveying this tale of abject fiction. Deputy Sheriff [REDACTED] [REDACTED] displays no compunction in her efforts to destroy the law enforcement career of the Appellant given that she has also filed an equally meritless TRO in the Los Angeles Superior Court-Chatsworth Courthouse, once again feigning this non-existent domestic abuse claim that was subsequently dismissed by her on July 30, 2015 in lieu of testifying falsely under oath before a Superior Court Judge.

The termination by the LASD has no basis in fact given the fatally flawed underpinnings and concocted falsehoods of non-existent domestic abuse and other insulting events that did not in fact ever take place. Appellant should be immediately reinstated to his

1 position as an (FTO) forthwith with restoration of all back pay and benefits from his date of  
2 termination.

3  
4 Dated: February 27, 2018

By:   
Michael A. Goldfeder, Attorney for  
Appellant Caren Mandoyan

PROOF OF SERVICE BY MAIL - 1013A, 2015.5 C.C.P.

STATE OF CALIFORNIA )  
COUNTY OF LOS ANGELES )

I am employed in the county aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my business address is 400 Continental Boulevard, 6<sup>th</sup> Floor, El Segundo, CA. 90245.

On February 27, 2018 I served the within document described as:

**Appellant Caren Mandoyan's Objections to the Decision of the Hearing Officer**

On interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Christine Roam  
Los Angeles County Sheriff's Department  
4900 S. Eastern Avenue, # 101  
City of Commerce, CA. 90040  
US Mail

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal collection date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare, under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on February 27, 2018 at El Segundo, California.

  
Michael A. Goldfeder

43

*In the Matter of the Discharge of  
Caren Mandoyan*

16-276

Objections of Appellant Caren  
Mandoyan to the Decision of the  
Hearing Officer